

UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD  
CHARGE AGAINST EMPLOYER

## INSTRUCTIONS.

DO NOT WRITE IN THIS SPACE

Case

Date Filed

05-CA-205885

9/8/17

File an original of this charge with NLRB Regional Director in which the alleged unfair labor practice occurred or is occurring

## 1 EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a Name of Employer MillerCoors LLC		b Tel. No (540)289-8500
		c Cell No
d Address (street, city, state ZIP code) 5135 S East Side Hwy, Elkton, VA 22827-3469	e Employer Representative <del>Amy J. Michtich</del> Plant Manager  John Stonebraker	f Fax No (540)289-8405
		g e-Mail John.Stonebraker <del>amy.michtich@millercoors.com</del>
		h Dispute Location (City and State) Elkton, VA
i Type of Establishment (factory, nursing home hotel) Factory	j Principal Product or Service  malt beverages	k Number of workers at dispute location  530

1 The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) (3) and (4) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act or these unfair labor practices are unfair practices affecting commerce within the meaning of the Act and the Postal Reorganization Act

2 Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)

On (b) (6), (b) (7)(C) the Employer barred (b) (6), (b) (7)(C) from entering the work place and took away (b) (6), (b) (7)(C) ID card. The action was termed as disciplinary. However, it was in apparent retaliation for employee's past union organizing activities, and for providing evidence to the Board, as well as engaging in other protected, concerted activities for which employer was forced by several US government agencies to take remedial actions in the work place.

3 Full name of party filing charge (if labor organization give full name including local name and number)

(b) (6), (b) (7)(C)

4a Address (street and number, city, state, and ZIP code)

(b) (6), (b) (7)(C)

4b Tel. No

(b) (6), (b) (7)(C)

4c Cell No

(b) (6), (b) (7)(C)

4d Fax No

4e e-Mail

(b) (6), (b) (7)(C)

5 Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)

## 6 DECLARATION

I declare that I have read the above charge and that the statements are true to the best of my (b) (6), (b) (7)(C)

Tel. No

(b) (6), (b) (7)(C)

By

(signature of representative of person making charge)

(b) (6), (b) (7)(C)

Print Name and Title

Office, if any, Cell No

(b) (6), (b) (7)(C)

Fax No

Address

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

Date

11 AUG 17

e-Mail

(b) (6), (b) (7)(C)

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)  
PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information will cause the NLRB to decline to invoke its processes.

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

8-11-17





UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD

REGION 5  
BANK OF AMERICA CENTER, TOWER II  
100 S. CHARLES STREET, SUITE 600  
BALTIMORE, MD 21201

Agency Website: [www.nlr.gov](http://www.nlr.gov)  
Telephone: (410) 962-2822  
Fax: (410) 962-2198



Download  
NLRB  
Mobile App

September 11, 2017

Mr. John Stonebraker  
Plant Manager  
MillerCoors, LLC  
5135 South East Side Highway  
Elkton, VA 22827-3469

Re: MillerCoors, LLC  
Case 05-CA-205885

Dear Mr. Stonebraker:

Enclosed is a copy of a charge that has been filed in this case. This letter tells you how to contact the Board agent who will be investigating the charge, explains your right to be represented, discusses presenting your evidence, and provides a brief explanation of our procedures, including how to submit documents to the NLRB.

**Investigator:** This charge is being investigated by Board Agent William L. Szabo whose telephone number is (410) 962-0926. If this Board agent is not available, you may contact Supervisory Field Examiner David A. Colangelo whose telephone number is (410) 962-0180.

**Right to Representation:** You have the right to be represented by an attorney or other representative in any proceeding before us. If you choose to be represented, your representative must notify us in writing of this fact as soon as possible by completing Form NLRB-4701, Notice of Appearance. This form is available on our website, [www.nlr.gov](http://www.nlr.gov), or from an NLRB office upon your request.

If you are contacted by someone about representing you in this case, please be assured that no organization or person seeking your business has any "inside knowledge" or favored relationship with the National Labor Relations Board. Their knowledge regarding this proceeding was only obtained through access to information that must be made available to any member of the public under the Freedom of Information Act.

**Presentation of Your Evidence:** We seek prompt resolutions of labor disputes. Therefore, I urge you or your representative to submit a complete written account of the facts and a statement of your position with respect to the allegations set forth in the charge as soon as possible. If the Board agent later asks for more evidence, I strongly urge you or your representative to cooperate fully by promptly presenting all evidence relevant to the investigation. In this way, the case can be fully investigated more quickly.

Full and complete cooperation includes providing witnesses to give sworn affidavits to a Board agent, and providing all relevant documentary evidence requested by the Board

agent. Sending us your written account of the facts and a statement of your position is not enough to be considered full and complete cooperation. A refusal to fully cooperate during the investigation might cause a case to be litigated unnecessarily.

In addition, either you or your representative must complete the enclosed Commerce Questionnaire to enable us to determine whether the NLRB has jurisdiction over this dispute. If you recently submitted this information in another case, or if you need assistance completing the form, please contact the Board agent.

We will not honor any request to place limitations on our use of position statements or evidence beyond those prescribed by the Freedom of Information Act and the Federal Records Act. Thus, we will not honor any claim of confidentiality except as provided by Exemption 4 of FOIA, 5 U.S.C. Sec. 552(b)(4), and any material you submit may be introduced as evidence at any hearing before an administrative law judge. We are also required by the Federal Records Act to keep copies of documents gathered in our investigation for some years after a case closes. Further, the Freedom of Information Act may require that we disclose such records in closed cases upon request, unless there is an applicable exemption. Examples of those exemptions are those that protect confidential financial information or personal privacy interests.

**Procedures:** We strongly urge everyone to submit all documents and other materials by E-Filing (not e-mailing) through our website, [www.nlr.gov](http://www.nlr.gov). However, the Agency will continue to accept timely filed paper documents. Please include the case name and number indicated above on all your correspondence regarding the charge.

Information about the Agency, the procedures we follow in unfair labor practice cases and our customer service standards is available on our website, [www.nlr.gov](http://www.nlr.gov) or from an NLRB office upon your request. NLRB Form 4541 offers information that is helpful to parties involved in an investigation of an unfair labor practice charge.

We can provide assistance for persons with limited English proficiency or disability. Please let us know if you or any of your witnesses would like such assistance.

Very truly yours,

A handwritten signature in cursive script, reading "Charles L. Posner".

Charles L. Posner  
Regional Director

Enclosures:

1. Copy of Charge
2. Commerce Questionnaire





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Download  
NLRB  
Mobile App

September 11, 2017

(b) (6), (b) (7)(C)

Re: MillerCoors, LLC  
Case 05-CA-205885

Dear (b) (6), (b) (7)(C):

The charge that you filed in this case on September 08, 2017 has been docketed as case number 05-CA-205885. This letter tells you how to contact the Board agent who will be investigating the charge, explains your right to be represented, discusses presenting your evidence, and provides a brief explanation of our procedures, including how to submit documents to the NLRB.

**Investigator:** This charge is being investigated by Board Agent William L. Szabo whose telephone number is (410) 962-0926. If this Board agent is not available, you may contact Supervisory Field Examiner David A. Colangelo whose telephone number is (410) 962-0180.

**Right to Representation:** You have the right to be represented by an attorney or other representative in any proceeding before us. If you choose to be represented, your representative must notify us in writing of this fact as soon as possible by completing *Form NLRB-4701, Notice of Appearance*. This form is available on our website, [www.nlr.gov](http://www.nlr.gov), or at the Regional office upon your request.

If you are contacted by someone about representing you in this case, please be assured that no organization or person seeking your business has any "inside knowledge" or favored relationship with the National Labor Relations Board. Their knowledge regarding this proceeding was only obtained through access to information that must be made available to any member of the public under the Freedom of Information Act.

**Presentation of Your Evidence:** As the party who filed the charge in this case, it is your responsibility to meet with the Board agent to provide a sworn affidavit, or provide other witnesses to provide sworn affidavits, and to provide relevant documents within your possession. Because we seek to resolve labor disputes promptly, you should be ready to promptly present your affidavit(s) and other evidence. If you have not yet scheduled a date and time for the Board agent to take your affidavit, please contact the Board agent to schedule the affidavit(s). If you fail to cooperate in promptly presenting your evidence, your charge may be dismissed without investigation.

**Procedures:** We strongly urge everyone to submit all documents and other materials by E-Filing (not e-mailing) through our website [www.nlr.gov](http://www.nlr.gov). However, the Agency will continue



to accept timely filed paper documents. Please include the case name and number indicated above on all your correspondence regarding the charge.

Information about the Agency, the procedures we follow in unfair labor practice cases and our customer service standards is available on our website [www.nlr.gov](http://www.nlr.gov) or from the Regional Office upon your request. *NLRB Form 4541, Investigative Procedures* offers information that is helpful to parties involved in an investigation of an unfair labor practice charge.

We can provide assistance for persons with limited English proficiency or disability. Please let us know if you or any of your witnesses would like such assistance.

Very truly yours,

A handwritten signature in black ink, reading "Charles L. Posner". The signature is written in a cursive, flowing style.

Charles L. Posner  
Regional Director

Enclosure: Copy of Charge



November 17, 2017

William L. Szabo  
National Labor Relations Board – Region 5  
Band of American Center, Tower II  
100 S. Charles Street, Suite 600  
Baltimore, MD

Re: MillerCoors, LLC  
Case 05-CA-205885

Dear Mr. Szabo:

This letter is the statement of position by Respondent, MillerCoors LLC, in the above-referenced case. The charge alleges that MillerCoors, LLC<sup>1</sup> (the “Employer” or “MillerCoors”) violated Sections 8(a)(3) and 8(a)(4) of the National Labor Relations Act with respect to discipline and termination of employment of (b) (6), (b) (7)(C). MillerCoors denies the allegations of the charge, and specifically denies that it violated the Act with respect to (b) (6), (b) (7)(C).

### **Background**

MillerCoors operates breweries in a number of locations throughout the United States, including the Shenandoah Brewery, located in Elkton, Virginia. The hourly employees at the Shenandoah Brewery work in various departments, including the Brewing Department, where beer is produced; the Packaging Department, where cans, bottles and kegs of beer are filled, sealed, and packed in various size cartons and cases; and the Warehouse Department, where the packaged beer is loaded onto pallets, bound in shrink wrap, moved to temporary storage slots, and then loaded onto trucks and train cars. (b) (6), (b) (7)(C) worked as (b) (6), (b) (7)(C) in the warehouse. Duties include, but are not limited to, the following:

- Start up, operate, shut down and maintain warehouse equipment;
- Operate fork truck in a safe manner;
- Operate can and bottle palletizers;
- Fill orders accurately and maintain legible and accurate documentation;
- Load and ship product in rail cars or trailers using shipping standards and procedures as well as the RF computer system.
- Responsible for producing a quality product by monitoring product, performing quality checks, maintaining quality logs and records. Ensures the correct codes and dates are present on the packaged material.
- Maintain productivity at established line rates.
- Perform job assignments in a safe and professional manner and use personal protective equipment as specified by company guidelines.

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<sup>1</sup> The correct legal name of Respondent is MillerCoors LLC without a comma.



The Shenandoah Brewery policies and work rules are published in the Shenandoah Brewery Policy Guide. The Policy Guide is provided at tab 1a. This Policy Guide applies to all Shenandoah Brewery employees. Employees have electronic access to the Policy Guide and are periodically trained on policies and rules. During the course of any discussions about discipline with (b) (6), (b) (7)(C) or (b) (6), (b) (7)(C) appeal of discipline through the peer review appeal process at the brewery, (b) (6), (b) (7)(C) never claimed that (b) (6), (b) (7)(C) was unfamiliar with the relevant or applicable policies or rules.

The work rules and safety rules for the brewery are found starting at page 21 of the Policy Guide. The progressive disciplinary actions issued to (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C) discharge, were a result of (b) (6), (b) (7)(C) repeated violation of these rules. The Employer denies any claim that the disciplinary actions and discharge were due to union-related activity or other protected, concerted activity. In fact, it should be noted that although the Policy Guide, at page 22, describes a progressive discipline process having three steps (first warning, final warning, discharge), the Employer applied a fourth step with (b) (6), (b) (7)(C) a Last Chance Final Warning, issued (b) (6), (b) (7)(C) 2017. The Policy Guide at page 22 says "the Company reserves the right to impose the level of discipline it believes is appropriate after considering the facts and circumstances." The Employer decided to use a Last Chance Final Warning with (b) (6), (b) (7)(C) as an additional way to be fair and to be very transparent about the fact that if (b) (6), (b) (7)(C) performance did not improve, termination could result.

The Employer denies that the disciplinary action or termination of employment were retaliatory. MillerCoors takes seriously the principle of non-retaliation, and there are several policies and rules which reiterate and enforce this commitment. In the work rules section of the Shenandoah Brewery Policy Guide, there are certain rule violations which are deemed severe enough to warrant immediate termination. One of these rules, found at page 24 of the Policy Guide, prohibits retaliatory acts. It reads:

Retaliatory acts - any attempt, successful or unsuccessful, to abuse, threaten or harm another employee; causing damage to or loss of property to gain revenge or retribution for the legitimate actions or perceived actions of the victim. This includes retaliation for use of the appeal system and of the discrimination and sexual harassment or EEO complaint procedures or for reporting a violation of the Code of Conduct, including such matters as accounting or auditing irregularities, fraud, environmental violations or health and safety issues.

Shenandoah Brewery employees are also covered by the MillerCoors Code of Business Conduct, which applies to all MillerCoors employees. It is provided at tab 1b. Annually all employees receive training on the Code of Business Conduct. The MillerCoors Code of Business Conduct includes the following:

Each of us can report any suspected violation of the law, regulations, our Code or Company Policies without fear of retaliation. MillerCoors strictly prohibits retaliatory acts – such as demotion, harassment or other negative acts – against a person for reporting suspected violations in good faith.

Another important policy in the Shenandoah Brewery Policy Guide is the Conflict Resolution Process for escalating and resolving disputes, found at page 3 of the Policy Guide. A key element of this policy is the Appeal Process which an hourly employee can invoke to have peer-review of disciplinary action. The result of the appeal process is binding on both



management and the employee who files the appeal, and the result stands as part of the employee's record. The HR staff assists the employee in preparing for appeal. The Appeal Process policy states:

The process provides for a review of the action based on presentation of the facts by the employee and the Process Leader or Manager. The facts are reviewed by two peers, selected randomly and knowledgeable of the policies and procedures involved, and the Vice President/Plant Manager or if unavailable a member of the Plant Manager's staff selected at random. Both the employee and Process Leader or Manager has a right to refuse one randomly selected participant. The Human Resources Manager or designated representative serves in a moderating capacity. The Appeal Board decision making is by majority rule. The decision of the appeal procedure is final and binding on the impacted parties. Appeal Boards may uphold, modify, or reverse disciplinary action.

### Disciplinary History

The Shenandoah Brewery Policy Guide states that "corrective discipline is based on discipline received in the last 12-month period." A review of (b) (6), (b) (7)(C) record for the 12-months preceding (b) (6), (b) (7)(C) termination of employment shows:

(b) (6), (b) (7)(C) /2016 First Written Warning – not meeting set objectives (not following pre-shift meeting structure) – issued by (b) (6), (b) (7)(C). The use of structured, pre-shift meetings is part of the commitment to world class manufacturing at MillerCoors. A specific agenda is followed and a protocol exists to assure that the content is uniform throughout the brewery network and that all necessary benchmarks are covered (e.g. safety, people, quality, customer service, cost, etc.) in each meeting. The importance of the pre-shift meeting structure is further explained in documents provided at tab 13. (b) (6), (b) (7)(C) had previously been "coached" by (b) (6), (b) (7)(C) on (b) (6), (b) (7)(C) 016 about not following the pre-shift meeting structure. When (b) (6), (b) (7)(C) continued to not comply, this written warning was issued.

(b) (6), (b) (7)(C) /2017 Final Written Warning - not meeting set objectives (incorrect set up on palletizer) – issued by (b) (6), (b) (7)(C). The facts of this incident are contained in documents provided as part of the personnel file, tab 4. This was issued as a Final Written Warning per the progressive discipline process because (b) (6), (b) (7)(C) already had a First Written Warning during the twelve month period. (b) (6), (b) (7)(C) exercised (b) (6), (b) (7)(C) right to appeal. The appeal panel modified the discipline to a first written warning, to be consistent with other employees who received similar discipline, even though those employees, unlike (b) (6), (b) (7)(C) did not already have a first warning in their file. The appeal panel decision is provided at tab 13.

(b) (6), (b) (7)(C) /2017 Final Written Warning – aggressive behavior – issued by (b) (6), (b) (7)(C). Also issued was a mandatory referral to the Employee Assistance Program. The specific facts of this incident are covered later in this letter, and are covered by documents provided at tab 5. (b) (6), (b) (7)(C) did not appeal this through the appeal process. On (b) (6), (b) (7)(C) 2017, when (b) (6), (b) (7)(C) returned to work, (b) (6), (b) (7)(C) apologized in writing for (b) (6), (b) (7)(C) behavior.

(b) (6), (b) (7)(C) /2017 Last Chance Final Warning – performance – partial pallet was incorrectly reported and stored by (b) (6), (b) (7)(C) as a full pallet – issued by (b) (6), (b) (7)(C). The facts of this incident are contained in documents provided as part of the personnel file, tab 4. (b) (6), (b) (7)(C) appealed this and the appeal panel upheld the discipline. The appeal panel decision is



provided at tab 13. Prior to assessing this discipline, the Employer had coached (b) (6), (b) (7)(C) on at least two occasions about (b) (6), (b) (7)(C) unsatisfactory performance in this regard, as demonstrated by documents in the personnel file, provided at tab 4:

- (b) (6), (b) (7)(C) 2017 – Coaching for incorrect process order – ran process incorrectly (issued to both operators involved) – issued by (b) (6), (b) (7)(C)
- (b) (6), (b) (7)(C) 2017 – Coaching for picking up pallets that had a different product description than what was on the screen – issued by (b) (6), (b) (7)(C)

(b) (6), (b) (7)(C) /2017 Discharge for not reporting damage to equipment – issued by (b) (6), (b) (7)(C). The specific facts of this incident are covered later in this letter, and are covered by documents provided at tab 6. (b) (6), (b) (7)(C) appealed this and the appeal panel upheld the discharge.

### **Employer Response to Specific Allegations**

The allegations letter from the NLRB asks MillerCoors to respond specifically to the following allegations regarding the July 13 final warning and the October termination of employment:

**Allegations 1 and 2:** (b) (6), (b) (7)(C) alleges that the July 13 discipline was in retaliation for past union-related activity, raising workplace safety concerns, and filing complaints about inadequate training.

On (b) (6), (b) (7)(C), 2017, (b) (6), (b) (7)(C) received a Final Written Warning and mandatory referral to the Employee Assistance Program (EAP) due to an incident on (b) (6), (b) (7)(C) in which (b) (6), (b) (7)(C) threatened (b) (6), (b) (7)(C) who had found (b) (6), (b) (7)(C) in the breakroom, out of (b) (6), (b) (7)(C) work area, before the end of the shift. During a meeting in (b) (6), (b) (7)(C) office to discuss the matter, (b) (6), (b) (7)(C) acted in an aggressive, threatening manner, at one point advancing into (b) (6), (b) (7)(C) personal space to the point that (b) (6), (b) (7)(C) was backed into (b) (6), (b) (7)(C) desk, telling (b) (6), (b) (7)(C) that (b) (6), (b) (7)(C) needed to watch (b) (6), (b) (7)(C) and after the incident telling others that "in order to prevent a workplace violence issue, (b) (6), (b) (7)(C) shouldn't be in a room alone with (b) (6), (b) (7)(C)

An investigation of the incident, documented at tab 5, found that (b) (6), (b) (7)(C) actions were in violation of the MillerCoors Code of Business Conduct which prohibits violence and threats of violence (tab 1b, page 20) and in violation of the Shenandoah Policy Guide which prohibits threatening another person, or exhibiting intimidating behavior (tab 1a, page 24). The investigation included statements from witnesses and from (b) (6), (b) (7)(C). The Employer issued progressive discipline in the form of a Final Warning, dated (b) (6), (b) (7)(C) and made a mandatory referral of (b) (6), (b) (7)(C) to the Employee Assistance Program (EAP), in part because (b) (6), (b) (7)(C) admitted (b) (6), (b) (7)(C) had anger and hostility specifically toward (b) (6), (b) (7)(C) was not returned to work until cleared to do so by the EAP, but during (b) (6), (b) (7)(C) time off work, (b) (6), (b) (7)(C) received short term disability pay, per Employer policy.

The appropriateness of the Employer's action is illustrated by the fact that when (b) (6), (b) (7)(C) received the mandatory referral to the EAP, (b) (6), (b) (7)(C) stated that (b) (6), (b) (7)(C) was relieved and that this is what was needed. Following (b) (6), (b) (7)(C) return to work, (b) (6), (b) (7)(C) wrote a letter to HR on (b) (6), (b) (7)(C) apologizing for (b) (6), (b) (7)(C) behavior. Also, although (b) (6), (b) (7)(C) was afforded the opportunity to appeal the Final Written Warning through the internal appeal process, (b) (6), (b) (7)(C) chose not to do so.

**Allegations 3-5:** (b) (6), (b) (7)(C) alleges that the (b) (6), (b) (7)(C) 2017 termination of employment was in retaliation for past union-related activity, raising workplace safety concerns and



**filing complaints about inadequate training, and in retaliation for filing an NRLB charge.**

On (b) (6), (b) (7)(C) it was discovered that equipment used to wrap pallets had been damaged and was not operating. The wiring to the unit had been pulled out and 6 of 12 wires were severed. The Employer conducted an investigation which found that (b) (6), (b) (7)(C) had caused the damage with (b) (6), (b) (7)(C) forklift, that this had been brought to (b) (6), (b) (7)(C) attention by a co-worker, and that (b) (6), (b) (7)(C) failed to report the accident to supervision. (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) met with (b) (6), (b) (7)(C) on (b) (6), (b) (7)(C), 2017 to review the facts of the (b) (6), (b) (7)(C) 2017 incident. (b) (6), (b) (7)(C) was on vacation and unavailable between (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C). After review of the investigative facts, statements by witnesses and (b) (6), (b) (7)(C) statement acknowledging that (b) (6), (b) (7)(C) did not report the damage to equipment, the decision was made to terminate (b) (6), (b) (7)(C) which is consistent with the Employer's policies and practices. The safety rules found on pages 18-19 of the Shenandoah Policy Guide (tab 1a) include the following:

- Any accidents, near misses, or property damage should be immediately reported to a Team Leader/Manager or Safety and Security personnel.
- Immediately report all dangerous conditions, unsafe practices, malfunctioning equipment, and worn or defective tools to your supervisor.

(b) (6), (b) (7)(C) exercised (b) (6), (b) (7)(C) right to an appeal, and the peer-review panel conducted a hearing on (b) (6), (b) (7)(C) 2017. After a review of the facts, policies, statements and testimony from (b) (6), (b) (7)(C) and witnesses, the appeal panel upheld the termination. All documents associated with the incident, including the discharge notice and the decision by the appeal panel, are provided at tab 6.

At an unemployment compensation hearing on (b) (6), (b) (7)(C) 2017, (b) (6), (b) (7)(C) acknowledged that (b) (6), (b) (7)(C) was aware of the safety policy to report incidents.

**MillerCoors Did Not Retaliate Against (b) (6), (b) (7)(C)**

The Employer denies that it was acting in a retaliatory manner in connection with either the (b) (6), (b) (7)(C) or (b) (6), (b) (7)(C) incidents. With respect to the allegation of retaliation due to union activity, there have been union elections at Shenandoah over the 20+ years that the brewery has been open, and the last one was several years ago. Many, but not a majority, of employees voted for the union. MillerCoors supports the right of employees to choose whether to be represented by a union. Five large MillerCoors breweries and several small ones have been unionized for many years. To the extent that (b) (6), (b) (7)(C) supported a union (b) (6), (b) (7)(C) was one of several thousand employees at MillerCoors who have chosen to do so. MillerCoors does not retaliate against any employee due to support for a union.

The allegation of retaliation due to reports of workplace safety and employee training is similarly unfounded. The Employer takes safety very seriously, and as part of this, all Shenandoah employees are strongly encouraged to submit at least 2 safety observations each month using the on-line Business Operating System (BOS) process which encompasses routine documentation of safe and unsafe situations or actions in the workplace. This can include things the employee sees which the employee believes are unsafe and require attention, or things the employee did to rectify a potential safety hazard, and/or things the employee did or observed which promote safety or reflect good safety practices. These reports are expected of all employees, not something which is frowned upon or retaliated against. To the contrary,



employees are coached if they do not regularly submit their safety observations. The goal of the program is to promote safe behaviors or conditions as well as recognize unsafe behaviors and conditions and remedy such. A core principal of the program is "no blame" to encourage quick action and full participation by all employees in the program. Employees reporting the observations are routinely praised and recognized for their efforts, and the level of overall participation in the program is something which is measured as part of the quarterly incentive bonus program for all hourly employees at the brewery.

The BOS monthly safety entries by (b) (6), (b) (7)(C) from June 2016 to present are provided at tab 7. In July, 2016 (b) (6), (b) (7)(C) made two safety entries. (b) (6), (b) (7)(C) said that lines in the warehouse were being staffed with fewer people than recommended by the equipment manufacturer. Specifically, there is a palletizer machine on each line which stacks cases and cartons of beer on pallets and puts shrink wrap around the pallet for shipment, and (b) (6), (b) (7)(C) thought that equipment was understaffed. (b) (6), (b) (7)(C) also said that because the warehouse was treated as a single area of operation, forklift operators were picking up and dropping off pallets anywhere, which (b) (6), (b) (7)(C) viewed as unsafe. (b) (6), (b) (7)(C) entries the next couple of months reflect "no change" in conditions. In October, the entry says "progress toward compliance being made." Nothing more is noted in any of the remaining safety entries. (b) (6), (b) (7)(C) entries during the past 12 months note things like completion of safety training (Dec. 2016), observations of safe conditions and actions (multiple entries Jan. - Aug. 2017), as well as three miscellaneous conditions alleged to be unsafe (Feb. 2017 - visitors walking in the warehouse, May 2017 - drive forklifts more slowly to create safer conditions, and June 2017 - operator wearing a leather glove which could be a safety hazard when performing a particular task). (b) (6), (b) (7)(C) recalls meeting with (b) (6), (b) (7)(C) to discuss staffing in response to the July, 2016 entry. (b) (6), (b) (7)(C) said that the Employer believed staffing on the equipment was appropriate and safe, and (b) (6), (b) (7)(C) disagreed. (b) (6), (b) (7)(C) further advised (b) (6), (b) (7)(C) that equipment operating procedures do not dictate staffing levels. Further, on the forklift traffic concern, all forklift operators receive periodic training and are advised to obey all forklift traffic rules. The Employer denies that any of this was a factor in the discipline or discharge of (b) (6), (b) (7)(C).

The Employer is unaware of any "complaints" filed by (b) (6), (b) (7)(C) having to do with inadequate employee training. MillerCoors is committed to training employees on multiple skills. Due to the complexity of equipment and operations in a brewery, it is common for employees to request additional training, or identify training needs, and this is not a dialogue which would generate any form of retaliation.

The Employer likewise denies that filing of an NLRB charge by (b) (6), (b) (7)(C) prompted (b) (6), (b) (7)(C) termination. The incidents which led to each step of progressive discipline leading up to termination all took place before any Board charge was filed. The termination occurred weeks after the charge was filed, but it was in response to an event totally within (b) (6), (b) (7)(C) control, damage to equipment which (b) (6), (b) (7)(C) failed to report, and the termination took place only after a full and fair investigation during in which the facts, including statements by an hourly co-worker, clearly established both the damage by (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C) failure to report it.

(b) (6), (b) (7)(C) was not treated differently than other employees at Shenandoah. Other employees at the brewery have been disciplined for rule violations similar to those of (b) (6), (b) (7)(C). Disciplinary action reports for multiple employees are provided at tab 9. These show other employees receiving various steps of progressive discipline, including termination, for rule violations similar to those of (b) (6), (b) (7)(C) including job performance errors, incorrect set-up or warehouse orders, failure to report damage, causing damage with a fork truck, poor quality work, and violation of break guidelines. There is also an example of an employee being given



a mandatory referral to EAP.

It's worth emphasizing that MillerCoors had grounds to terminate (b) (6), (b) (7)(C) employment following (b) (6), (b) (7)(C) 2017 threatening conduct. Instead, it issued (b) (6), (b) (7)(C) a final written warning. Similarly, MillerCoors had grounds to terminate (b) (6), (b) (7)(C) employment again in (b) (6), (b) (7)(C) 2017 due to (b) (6), (b) (7)(C) poor performance. Instead, it issued (b) (6), (b) (7)(C) a last chance final warning. These are hardly the actions of an Employer engaging in retaliation. When (b) (6), (b) (7)(C) had used up all of (b) (6), (b) (7)(C) second chances, the peer-review panel upheld (b) (6), (b) (7)(C) termination.

## **Response to Request for Documents**

### **Item #1**

*Shenandoah Brewery Policy Guide.* **Provided in tab 1a.**

*MillerCoors Code of Conduct.* **Provided in tab 1b.**

(b) (6), (b) (7)(C) *Acknowledgment of Code of Conduct training.* **Provided in tab 1c.**

### **Item #2**

*Information about the Employee Assistance Program (EAP).* **Provided in tab 2.**

### **Item #3**

*The Employee Appeal Process.* **Provided in tab 1a, see page 3.**

### **Item #4**

(b) (6), (b) (7)(C) *complete personnel file, including written disciplines, coaching memos, and performance evaluations.* **Provided in tabs 4a and 4b.**

### **Item #5**

*Documentation related to July incident.* **Provided in tab 5.**

### **Item #6**

*Documentation related to September incident.* **Provided in tab 6.**

### **Item #7**

*The BOS safety audits from June 2016 through October 2017.* **Provided in tab 7.**

### **Item #8**

*Discussions between (b) (6), (b) (7)(C) June 2016 to October 2017.* **Provided in tab 8.**

### **Item #9**

*The medical statement that (b) (6), (b) (7)(C) provided the Employer in about (b) (6), (b) (7)(C) 2017, regarding (b) (6), (b) (7)(C). Per the EAP protocol no medical statement was issued or sent to the Employer by (b) (6), (b) (7)(C) concerning (b) (6), (b) (7)(C). All communication was issued via EAP vendor which was limited to report of (b) (6), (b) (7)(C) compliance to the EAP referral, documents provided in tab 9.*

### **Item #10**

*Examples of other employees disciplined and/or discharged for similar infractions.* **Provided in tab 10.**



Item #11

All correspondence, including email, between the Employer and (b) (6), (b) (7)(C) regarding the allegations listed above. **Provided in tabs 4, 5, 6, and 8.**

Item #12

Notes company representatives documenting the meetings between the Employer and (b) (6), (b) (7)(C) regarding the allegations listed above. **Provided in tabs 4, 5, 6, and 8.**

Item #13

Any other relevant documents

- Appeal panel decision in (b) (6), (b) (7)(C) 2017. **Provided in tab 13a**
- Importance of pre-shift meeting protocol. **Provided in tab 13b.**
- Appeal panel decision in (b) (6), (b) (7)(C) 2017. **Provided in tab 13c.**

For all of the above reasons, the charges in the instant case are without merit and should be dismissed.

Sincerely,

Douglas Heckler  
Director, Labor Relations  
MillerCoors  
3939 West Highland Blvd  
Milwaukee, WI 53201



# Policy Guide

*Published March 1, 2015*



Shenandoah Team Members,

At the Shenandoah Brewery, we place a high value on teamwork, on setting aggressive goals and pursuing those with energy and focus. As we continue to grow and find new ways of doing business, we must also ensure our policies and procedures are reflective of our core values and our business environment.

Policies are designed to create a common way of working and an engaging, productive workplace. The Shenandoah Brewery Policy Guide is designed to provide all team members with information detailing our local Shenandoah supplemental policies and MillerCoors company policies.

We have compiled these policies within this handbook in order to make information easy to find and readily available for your reference. Because our policies guide our individual behaviors, all team members should be familiar with the information detailed throughout this guide.

Frequently, policies and guidelines are updated or new policies are added to reflect changes in our business environment. Updates and revisions to this policy guide can be found on the Shenandoah Brewery SharePoint site under the Policy section.

As always, if you have questions about local Shenandoah or MillerCoors policies, please contact Rod Little, Shenandoah Brewery Sr. Human Resource Manager, at 540-289-8070 or me at any time.

I hope you find this guide useful and informative.

A handwritten signature in purple ink that reads "Amy".

*Amy J. Michtich*

**Vice President, Shenandoah Brewery**



**TITLE:** **SUPPLEMENTAL POLICY – Shenandoah Brewery** **ISSUE DATE:** 03/01/2015  
**APPROVAL:** Chief Human Resources Officer **SUPERSEDES:** 09/01/2010

<b>Purpose:</b>	This Supplemental Policy describes policies and procedures which apply to MillerCoors employees working at the Shenandoah Brewery, Elkton, VA.																																																							
<b>Scope:</b>	Unless otherwise provided, this Supplemental Policy applies to all MillerCoors employees working at the Shenandoah facility.																																																							
<b>Accountability:</b>	Coors Brewing Company applied unique policies reflecting the company’s culture to its employees working at the Shenandoah facility. The evolution of these policies contributed to a productive work environment for the Company and its employees. To maintain that work environment, MillerCoors seeks to maintain many of those same policies for those employees.																																																							
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**ACCEPTABLE USE POLICY** (see Tap Room>Policies & Guidelines>Policies)

### **AMERICANS WITH DISABILITIES ACT**

It is the policy of MillerCoors to comply with all the relevant and applicable provisions of the Americans with Disabilities Act (ADA). MillerCoors will not discriminate against any qualified employee or job applicant with respect to any terms, privileges, or conditions of employment because of a person's physical or mental disability.

MillerCoors will attempt to reasonably accommodate any qualified employee who is unable to perform the essential job functions of his or her position due to a disability as defined by state or federal law. An employee who believes that he or she is disabled and in need of accommodation, should contact the Human Resources Department.

### **BREAKS AND LUNCH PERIOD GUIDELINES**

Employees are encouraged to use break and lunch periods provided by the company. However, employees may not skip break periods to leave work earlier than scheduled.

In accordance with federal regulations and because we are classified as a food plant, break and lunch periods must be taken in designated areas or lunchrooms.

Employees are not allowed to take their break within the first hour of their shift or their last hour of their shift unless given prior approval by their Process Leader or Manager. Break and lunch periods vary by Department. Employees should consult with their Process Leader or Manager to determine the break and lunch period in their area.

Operations/Manufacturing Services/Quality:

- For 12-hour shift: 3 – 30 Minute Breaks/Lunch Periods (includes travel time)
- For 10-hour shift: 1 – 30 Minute Break/Lunch Period, 1 – 45 Minute Break/Lunch period (includes travel time)
- For 8-hour shift: 2 – 30 Minute Breaks/Lunch Periods (includes travel time)

### **BULLETIN BOARD POSTING POLICY**

Company bulletin boards shall be used exclusively for posting business updates and communications. However, bulletin boards will be designated and available for employee use in their selling, purchasing, or trading personal property items. These bulletin boards are located in or near the employee lunchrooms.

In an effort to ensure the bulletin boards information is current, the employee's name and date of posting should be listed on the posting item. At the conclusion of a thirty (30)



calendar day posting period, the notice shall be removed.

Solicitations for charity or on behalf of organizations, meeting announcements or commercial advertisements are prohibited and will not be approved for posting.

**CODE OF BUSINESS CONDUCT POLICY** (see Tap Room>Policies & Guidelines>Policies)

MillerCoors Code of Business Conduct reflects our commitment to Pride & Integrity. It brings life to our values, principles, and expectations of how we do business – to always do what is right regardless of business pressures. The Code applies to all of us and violations are not tolerated.

The Code is available through The Tap Room, so you can review it when faced with difficult decisions. However, the Code does not cover every situation you might encounter and it is not a substitute for good judgment and common sense. You need to understand the basic principles and standards in the Code and apply them in your work. You're also encouraged to have open and direct conversations with your manager, or talk to your Human Resources Manager, so we can stay focused on doing things the right way. And, if you ever feel you can't express concerns to members of your team, you can make a report anonymously by phone using the toll-free Helpline at 1-888-278-1496 or on the Internet at [www.MillerCoors.EthicsPoint.com](http://www.MillerCoors.EthicsPoint.com). We will protect you from retaliation when you make a report in good faith.

**CONFLICT RESOLUTION PROCESS (Appeal Process)**

(Applicable to all full-time hourly employees)

The Company provides the conflict-resolution process (C-RP) to assure quality relationships with all employees. Employees can use this policy to present to a higher authority complaints that are unresolved with the Process Leader or Manager. Temporary employees and employees within their first 90-days of employment do not have access to the C-RP. They are encouraged to speak with their Process Leader or Manager to resolve issues or contact a member of the Human Resources Department.

It is the intent of this process to facilitate the resolution of any issue at the lowest possible level. To that end, employees are expected to first discuss the matter with the Process Leader or Manager and, if necessary, with the Process Leader's Unit Manager or Department Manager.

The process has two avenues (1) to resolve all issues concerning discipline, (2) to resolve other issues. This process does not cover discrimination or harassment issues. Refer to the [Discrimination and Harassment Free Work Environment Policy](#) and the [Equal Employment Opportunities Policy](#) for additional information.

If the situation is a result of a disciplinary action, the avenue could involve an Appeal Process. The employee has a period of seven consecutive days from the date of the action to request appeal of the Company's decision. The complaint must be submitted to the Human Resources Manager, in writing, by the employee within 30 working days of the incident. The process provides for a review of the action based on presentation of the facts by the employee and the Process Leader or Manager. The facts are reviewed by two peers, selected randomly and knowledgeable of the policies and procedures involved, and the Vice President/Plant Manager or if unavailable a member of the Plant Manager's staff selected at random. Both the employee and Process Leader or Manager has a right to refuse one randomly selected participant. The Human Resources Manager or designated representative serves in a moderating capacity. The Appeal Board decision making is by majority rule. The decision of the appeal procedure is final and

binding on the impacted parties. Appeal Boards may uphold, modify, or reverse disciplinary action.

The complaint procedure to resolve non-disciplinary issues involves a discussion of the situation with members of the management chain of command. Such issues would generally involve application of company policies. The following steps are to be used in the process until the issue is resolved:

- The complaint must be submitted to the Human Resources Manager, in writing, by the employee within 30 calendar days of the incident.
- The Process Leader or Manager is required to review the situation and attempt to resolve the issue at that level. If the issue is not resolved at that level, the Department Manager is asked to respond in writing.
- If the employee is not satisfied with the decision, the Human Resources Manager or designated representative will review and provide a written decision.
- This review would precede the involvement of the Vice President/Plant Manager who has the final decision-making authority. Each level within the chain of command has five business days to formally respond to the employee's complaint.

**DISCRIMINATION AND HARASSMENT FREE WORK ENVIRONMENT POLICY** (see Tap Room>Policies & Guidelines>Policies)

#### **DRESS AND PERSONAL PROPERTY GUIDELINES**

MillerCoors – Shenandoah Brewery is committed to providing a safe and productive work environment. The way we present ourselves at work, including how we dress and personal property, creates an impression about our business and products, and can impact co-workers.

- Always follow safety requirements: wear your safety shoes, safety glasses, hearing protection and any personal protective equipment specific to a particular job/activity/task.
- Adhere to all government, company and/or facility regulations and good manufacturing practices (GMPs) which set the expectations with respect to a person's personal hygiene and cleanliness, clothing, removal of jewelry and other unsecured objects, glove maintenance, use of hair restraints, appropriate storage of personal items, and restrictions on various activities, such as eating and smoking in production areas.
- Employees' and visitors' attire and personal property must comply with our policies prohibiting harassment or discrimination: we do not permit clothing or personal property with profanity, nude or semi-nude pictures, or sexually offensive or racially-charged slogans, pictures, or symbols.  
Note: For guidance, we will also look to what is deemed appropriate by local and state government entities.
- Be proud of our products: we do not permit clothing promoting competitor's products.

Process Leaders and Managers are responsible for ensuring their team members, along with any vendors or guests, follow these guidelines, and reserve the right to send any person home to change clothes due to non-compliance with these guidelines. Employee's time away from work for this reason will follow the Attendance Policy guidelines. Progressive discipline may also be applied as warranted by the facts of a particular situation.

**DRUG-FREE WORKPLACE POLICY** (see Tap Room>Policies & Guidelines>Policies)



**EMPLOYEE ALCOHOL POLICY** (see Tap Room>Policies & Guidelines>Policies)

**EMPLOYMENT AND INCOME VERIFICATION**

MillerCoors uses **The Work Number** to provide automated employment and income verifications for our employees. **The Work Number** is an automated service that provides employees a variety of human resources and payroll services, including employment and income verification. This fast, secure service is used when applying for a mortgage or loan, for reference checking, leasing an apartment or any other instance where proof of employment or income is needed. You benefit from having control of the process by authorizing others access to your information.

**The Work Number** can be used anytime, anywhere – available 24 hours a day, 7 days a week at 1-800-367-2884 or [www.TheWorkNumber.com](http://www.TheWorkNumber.com). MillerCoors employer number is 10119. Please contact the HR Department for instructions on using **The Work Number**.

**EMPLOYMENT CLASSIFICATIONS**

Employment classifications are used in reference to payroll and benefit eligibility. Following are the employment classifications used by MillerCoors:

- Full-time Regular Employee – Employees who work a full-time work schedule and are eligible for all company benefits after meeting the required qualifying period.
- Temporary Workers – Employees who are hired directly by the company or contracted through an agency to provide a flexible workforce as needed. Temporary employees hired on MillerCoors payroll are eligible for 401(k) and gratis beer benefits, but no other company provided benefits unless required by law.

**EMPLOYMENT OF RELATIVES POLICY** (see Tap Room>Policies & Guidelines>Policies)

**EQUAL EMPLOYMENT OPPORTUNITIES POLICY** (see Tap Room>Policies & Guidelines>Policies)

**FAMILY AND MEDICAL LEAVE ACT (FMLA)** (see Tap Room>Policies & Guidelines>Policies)

Regular full-time employees will be paid for the first three (3) full work days missed per calendar year for approved FMLA for the care of other family members.

Please reference Pay Status While on FMLA, of the company Family and Medical Leave Act, for further direction on requirements of substituting pay during FMLA time off.

Paid FMLA hours will not be considered as hours worked for computing overtime.

**FITNESS FOR DUTY POLICY** (see Tap Room>Policies & Guidelines>Policies)

**GRATIS BEER POLICY** (see Tap Room>Policies & Guidelines>Policies)

Employees on Long Term Disability are not eligible for Gratis Beer, but will be eligible to purchase beer so long as they were at least age 55 with 10 or more years of service on their Long Term Disability effective date.

### **INCLEMENT WEATHER PROTOCOL**

It is MillerCoors intention to keep the brewery open and provide work for any employee who can and does report to work during periods of inclement weather. During periods of inclement weather, each employee should evaluate weather conditions in his/her area and make a responsible decision regarding his/her ability to arrive safely at work.

If the brewery is open and an employee is unable to report to work, is late, or leaves early because of inclement weather, normal attendance policies will apply. Employees will not be paid for hours not worked.

In cases involving inclement weather, in which the brewery shuts down, employees may use vacation pay, paid personal time, or non-scheduled for the regularly scheduled work hours in which the brewery is shut down.

A good faith effort will be made to declare a plant closing two (2) + hours prior to the start of a shift.

Utilities, Waste Treatment, Brewing, and Security departments and in some instances IPD are deemed essential personnel and therefore these departments do not shutdown. Normal attendance policies will apply for absences of employees from the essential departments.

Team members who report for work, then voluntarily request to leave work early due to inclement weather and who leave with Process Leader, Manager, or designated representative approval may elect to take time as non-scheduled/unpaid, or apply available vacation/personal time.

All employees should have access to the general plant phone number 540-289-8100. Employees are expected to have their team/process leader's or manager's company phone number and are responsible for understanding the shutdown procedure.

Shenandoah Hotline: Employees are encouraged to call 540-289-8131 to listen to pre-recorded information regarding potential plant closures or schedule changes. When you dial the number and hear "all lines are running as normal" the brewery is in operation and your team is counting on you being there.

WVIR-Channel 29 in Charlottesville, WHSV-TV3 in Harrisonburg and WSVA-AM 550 will be contacted if schedule changes or shutdowns become necessary. It should be noted that the stations receive numerous announcements during inclement weather, therefore when and how often the MillerCoors announcement is made is not predictable. Channel 29 and TV3 will also carry the information on their website.

### **JOB ASSIGNMENTS/CROSS-TRAINING**

In order to meet the needs of our customers, MillerCoors reserves the right to assign employees to a variety of different jobs within the facility. In addition to benefitting the company by creating a highly versatile workforce, cross-training is a huge benefit to our employees. Cross-training broadens your skill base and provides you with the opportunity to work available overtime in other departments.

### **JOB POSTING POLICY**

It is the Company's policy to fill hourly job openings by promotion or transfers from within the Company if there are qualified candidates among our full-time regular employees. All transfers and promotions will be made in accordance with federal, state, and local laws concerning Equal Employment Opportunities and with full regard to the approved



Affirmative Action Plan for minorities, females, and disabled veterans, veterans of the Vietnam Era, and disabled workers, which are maintained at this location. The Company reserves the right to assign employees temporarily to adjust employment levels to changing workloads or to transfer employees permanently to better meet the goals and objectives of the Company's operations. Such actions will not be considered as part of the Job Posting Policy.

### **Procedure**

The Company will consider eligible, qualified full-time regular employees for transfer or promotion to open positions before external candidates are considered for employment. Employees will be notified via internal company communications of specified hourly job openings and given the opportunity to apply for these jobs through the Job Posting procedure.

Openings will be posted for ten (10) calendar days to allow employees within the same job title/classification to transfer to a preferred team, line or process. Selection will be based on seniority of those interested and eligible per job posting guidelines.

Priority of selection process for internal transfers within a classification will be as follows:

1. Within Team, Process (Example: Team A, Bottle Line 3)
2. Within Team, Business Unit (Example: Team A, Bottles)
3. Across all Teams and within Business Unit (Example: All Teams, Bottles)
4. Within Business Area across all Teams and Processes ( Example: All Packaging Set Up Operators)
5. All Business Areas, all Teams ( Example: All Set Up Operators in Brewing, Packaging and Warehouse)

Business Areas are defined as follows:

- Brewery
- Packaging
- Warehouse
- Quality
- Storeroom

Business Units are defined as follows:

- Bottles
- Cans
- Kegs
- Warehouse

Processes are defined as follows:

- Bottle Line 3
- Bottle Line 4
- Cans 1&2
- Can 3
- Kegs
- Warehouse
- Beer Flow
- IPD
- Brewery

Openings for additional staffing for the following areas are selected on an interview basis and will be posted on a Brewery wide basis for ten (10) calendar days. Interviews will be conducted for the eligible candidates meeting the minimum criteria. In making selection decisions for interview positions, seniority will be the determining factor provided that

qualifications and ability are equal among candidates.

Interview select positions:

- Heavy Equipment Operator
- Line Maintenance Mechanic
- Line Maintenance Electrician
- Utilities Technician
- Environmental Pollution Control Technician
- Fork Lift Maintenance Technician
- Set Up Operator – Brewing
- Set Up Operator – Packaging Keg Line
- Set Up Operator – Beer Flow and Dispatch
- Manufacturing Engineering Technician
- Brewing Engineering Technician
- PEST – Electrical
- PEST – Mechanical
- Storeroom
- Quality Technologist

Additional job openings of the same nature will not be re-posted for thirty (30) calendar days after the original job posting has been closed. Applications for the original posting will remain active for thirty (30) calendar days following the posting.

Interested candidates must submit a resume for consideration prior to the closing date of job posting.

In making selection decisions, seniority will be the determining factor provided that qualifications and ability are equal among candidates.

#### **Eligibility Guidelines**

- Employees with written disciplinary actions will not be eligible for a period of one (1) year from the date of the infraction.
- Employees who have accepted a job bid within one (1) year will not be eligible, unless there are no other internal candidates.
- Employees who have accepted a job bid are eligible to change teams, based on seniority, within the same department and classification without time limits.
- In the event of a Company initiated transfer, an employee is eligible to apply for posted job openings without time limits.

For salaried positions, see the Posting Policy on the Tap Room. Employees may apply for other positions within MillerCoors by utilizing the Posting Policy.

#### **LAYOFF OR TERMINATION**

MillerCoors reserves the right to layoff or terminate employees due to change in job functions or job requirements, or organizational change. Organizational change includes, but is not limited to, reductions-in-force, reorganization, restructuring, re-engineering, outsourcing, disposition of assets or operations, mergers and other business transactions. The Company will implement any such organizational change in the manner which best meets the staffing requirements of the Company.

#### **Seniority Positions**

Employees in seniority positions with the least seniority will be laid off provided the employees remaining are capable of performing the required work. Temporary and



probationary employees may, at management's discretion, be terminated prior to any layoff of regular full-time employees. Reduction in classification will occur by seniority within a classification within a workgroup. Employees laid off have no right to bump to other MillerCoors facilities.

For the purpose of this section, all fixed rate, hourly paid employees are considered one workgroup. The classifications within this workgroup are as follows:

- Heavy Equipment Operator
- Line Maintenance Mechanic
- Line Maintenance Electrician
- Utilities Technician
- Environmental Pollution Control Technician
- Fork Lift Maintenance Technician
- Set Up Operator – Brewing
- Set Up Operator – Packaging
- Set Up Operator – Warehouse (including Beer Flow and Dispatch)
- Manufacturing Engineering Technician
- Brewing Engineering Technician
- PEST – Electrical
- PEST – Mechanical
- Storeroom
- Quality Technologist

Management will determine which classifications will be reduced and how many positions within these classifications will be eliminated.

If a position is eliminated within a classification, the employee with the least seniority within the classification is reduced to the next lower classification, provided such employee has sufficient seniority to do so and the displaced employee can be reasonably expected to meet the minimum qualifications of the new position within a maximum of 30 calendar days. This time frame will be reviewed on a case-by-case basis with Human Resources, and with the hiring manager, who will determine what the minimum requirements and expectations are within the 30 calendar day time frame.

An employee reduced from his or her classification may choose termination and a severance benefit in lieu of reassignment (if approved by management), if he or she waives the right to recall and signs a legal release giving up all rights to contest any matter related to the employee's employment or termination.

Production employees reduced from their workgroups may be assigned to temporary production positions. Available positions will be determined by management. The choice of available positions will be by MillerCoors seniority within the workgroup at the time of the reduction. No future selection rights for temporary positions will be given after the employee is assigned to a temporary position. The rate of pay for regular employees in temporary positions is current pay or top rate for the assigned classification, whichever is less.

Regular employees assigned to temporary positions may bid on available regular positions posted to employees. The least senior employee would be assigned/recalled to available regular positions in the event no more senior employee in a temporary position desires the position and hiring outside the workgroup would otherwise be necessary. Unless a temporary position is available, displaced employees will be laid off. Temporary employees may be terminated prior to any layoff of regular full-time employees. If insufficient temporary positions exist, employees will displace junior employees in the workgroup, by Company seniority, provided they meet the qualification criteria and can meet the responsibilities of the position within a 30 calendar day time

	<p>frame. Employees laid off are subject to recall. In the event of a layoff, employees within the same classification and/or workgroup may volunteer for termination and a severance benefit (if approved by management) and if he or she waives the right to recall and signs a legal release giving up all rights to contest any matter related to the employee's employment or termination. The most senior volunteers will be accepted, unless the Company decides a volunteer should not be accepted due to the business needs of the Company.</p> <p>A temporary layoff of 14 or less calendar days may be implemented within a department. Employees may be placed on this type of layoff without regard to seniority and may elect to take their vacation during this period.</p> <p><b>Seniority Positions, Recall or Severance Benefit</b></p> <p>Employees on extended layoff have recall rights for a period of time equal to their MillerCoors seniority, or two years, whichever is less. After that period of time, employees are terminated and no longer retain their seniority or recall rights.</p> <p>Recall is administered in reverse order of the layoff; that is, employees within the classification with the most MillerCoors seniority (who have not signed a waiver of recall right) are recalled first. Employees are recalled to the same classification whenever possible. Refusal of recall to a regular full-time job results in termination.</p> <p>Employees on layoff can refuse temporary job offers.</p> <p>Employees on layoff continue to accrue seniority for up to two years or their length of service, whichever is less.</p> <p>Regular employees who are reduced from their workgroup and subject to reassignment or layoff may elect termination and a severance benefit in lieu of reassignment or recall rights (if approved by management) if he or she waives the right to recall and signs a legal release giving up all rights to contest any matter related to the employee's employment or termination, after signing a waiver of their recall rights. However, they are ineligible to receive the severance benefit if they accept a job with the entity that is party to the business transaction with MillerCoors or the entity to which the business was outsourced.</p> <p>To determine the severance benefits provided by MillerCoors, please refer to the <u>Severance Policy - MillerCoors</u>. Outplacement services may available to eligible employees per the MillerCoors Severance Policy.</p> <p><b>Eligibility if On Medical Leave</b></p> <p>An employee who is laid off or whose job is eliminated due to a reduction-in-force or other organizational change while he or she is on medical leave will be continued on medical leave until the expiration of the 180 calendar day leave or until medically returned to work, whichever comes first. If the employee is returned to work before the expiration of the 180 calendar day leave, he or she is eligible to receive a severance benefit provided they meet the criteria as defined in the section above. If the employee is not returned to work before the expiration of the 180 calendar day leave, he or she is not eligible for a severance benefit, however, the employee may be eligible for benefits under the terms of the Company's long-term disability plan. An employee may receive a severance benefit or long-term disability, but not both.</p>
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## **NON-MEDICAL LEAVES**

### **Funeral Leave**

Employees may receive a paid funeral leave in the event of a death in the immediate family. Immediate family includes parents, brothers, sisters, spouse, domestic partner, children, grandparents and grandchildren as well as the parents, brothers, sisters, children, grandparents and grandchildren of the employee's spouse or domestic partner.

- The Company will compensate the employee for up to three (3) days of funeral leave pay at their regular straight time rate of pay.
- The days must be regularly scheduled work days.
- If the employee is on vacation when the funeral occurs, they may cancel their vacation and take the appropriate length of funeral leave.
- The days must be taken between the date of the death and no later than two (2) calendar days following the funeral.

Under extenuating circumstances, with prior approval from Human Resources, employees may take additional unpaid days without incurring absences.

Funeral leave hours will not be considered as hours worked for computing overtime.

### **Jury Leave**

If an employee is called to serve on a jury, MillerCoors pays the difference between their base rate and the amount received from the court unless otherwise required by state or local law. To be eligible for pay, the employee must provide proof of service rendered and payment(s) received from the court.

An employee released from jury duty with more than half of their shift remaining should contact their Process Leader or Manager to determine if they are needed to return to work to complete their shift.

An employee on evening or night shifts will not be required to work more than the total time of their shift, which will include time spent at jury duty.

Jury duty hours will not be considered as hours worked for computing overtime.

### **Military Leave**

Employees are granted military leave for active duty training sponsored by the Military Reserves or National Guard units.

Time off for weekend duty and 2-week camp may be taken in addition to vacation.

Employees continue to accumulate company service time during military leave. MillerCoors will pay the difference between the employee's regular base rate of pay and the amount of base pay received from the military service (excluding any additional pay or allowances). Employees must give their Process Leader or Manager at least 30 calendar days advance notice of training plans.

Employees who are called up ("ordered") to "active-duty" will be paid the difference between their regular MillerCoors base rate of pay and the amount of base pay received from the military service (excluding any additional pay or allowances) for a reasonable period of time. Note: MillerCoors reserves the right to implement a limitation period at any time; MillerCoors currently imposes no such limitation period. Consistent with the Uniformed Services Employment and Reemployment Rights Act, unpaid military leaves may be granted for employees who enlist or volunteer for active duty.

**Unpaid Personal Leave**

If an employee has compelling personal obligations requiring absence from work, the employee must apply for an unpaid personal leave of absence. The employee's manager has the discretion to grant or deny the request and leaves typically are not granted for more than 30 calendar days, unless the leave is FMLA qualified. Employees who are granted a personal, non-paid leave of absence must take any unused earned vacation prior to going onto unpaid status. During the unpaid leave status, employees are responsible for the payment of any/all continued benefits. For more details, contact the Human Resources Department.

**Civil Emergency Leave**

If an employee is involved in a volunteer civil emergency group, such as a volunteer fire department, and the employee is called to action, the employee is paid the straight time base rate of pay, excluding shift differentials and premium pay, for any actual work hours missed (even if time missed is on a weekend or other premium paid day). When the employee is called to duty, the employee must notify his or her Process Leader or Manager as soon as possible. If civil emergency duty disrupts adequate job performance, the employee may be asked to limit participation.

Paid time for Civil Emergency leave will be not be considered as hours worked for computing overtime.

**Pay and Benefits**

Time spent on leave, whether paid or unpaid, does not count as hours worked when determining overtime pay for non-exempt employees, nor for any benefit accrual or calculation, unless specifically provided in the benefit plan document or as required by law.

**NOTICE OF RESIGNATION OR RETIREMENT POLICY** (see Tap Room>Policies & Guidelines>Policies)

**PAY POLICY****Pay Definitions - Hourly Employees**

For the purpose of this policy, normal shift means 8, 10 or 12 hours, depending on shift assignment/work schedule.

- Holiday Pay -- Employees receive 8 hours pay for holidays.
- Vacation Pay -- Vacation pay is computed at the base rate of pay in effect when vacation begins. Note: vacation hours do not count towards hours worked or consecutive days when computing overtime eligibility.
- Report In Pay -- If an employee reports for work and operation is discontinued, the employee is paid for that time worked for a minimum of 2 hours reporting pay.
- Call In Pay -- Employees called in on a non-scheduled day or called back to work after their shift has been completed and they have left the plant, are paid one and one-half times base rate for hours worked. Employees receive a minimum of two hours call in pay.
- Workday Trades - Employees may trade workdays with other employees provided that the trade does not result in additional wage costs being incurred by the Company and are approved by their Process Leader or Manager.
- Overtime -The Process Leader or Manager must authorize all overtime work before the work is done. If overtime work is required as an extension of a straight time workday, an additional 10 minute paid break is given for every 2 additional hours worked. When an employee is scheduled to work days off, every effort is made to give as much advance notice as possible.



Regular full-time hourly paid positions receive overtime at one and one-half times base rate in the following situations:

- All hours worked in excess of regular scheduled hours per shift.
- All regular scheduled hours worked in excess of 40 hours per week.
- All hours worked on a non-scheduled day or when called back to work after shift has been completed.
- All hours worked on Company scheduled holidays employees are paid according to the guidelines in the section entitled Holiday Pay.
- Company designated holiday hours or hours worked on a holiday, whichever is greater, count as hours worked in computing overtime.
- All hours worked on the 6th consecutive day in a work week (to be considered a 6th consecutive day worked, at least one-half of the scheduled shift must be worked on each of the preceding 5 days.

When a hourly employee works 7 consecutive days and the 7th day is Sunday, the employee receives overtime pay at two times the base rate. To be considered a 7th consecutive day worked, employees must work at least half of their scheduled shift on each of the preceding 6 days.

A hourly employee working beyond their normal Saturday shift into Sunday, or in advance of the scheduled Monday shift, will be compensated at two times their regular rate of pay if the requirement for working the previous six days has been satisfied. This encompasses the period from 11:00 PM on Saturday night to 10:45 PM Sunday night. Any time worked beyond 10:45 PM on Sunday night will be paid as time worked on Monday.

Temporary employees receive overtime pay at one and one-half times base rate for all hours worked over 40 hours per week, and all hours worked on a holiday.

#### **Shift Differential**

Shift differential is a premium pay rate for working afternoon or graveyard shift. Shift differentials are computed for the entire shift on the basis of the differential in effect when the shift began. In computing overtime pay, the applicable shift differential is considered as a portion of the employee's base pay. Hourly employees working afternoon shift receive \$0.25 per hour shift differential and employees working graveyard shift receive \$0.35 per hour shift differential.

To determine afternoon shift and graveyard shift, the following formula will be used: Those shifts where the shift start time is between 11:00am and 5:00 p.m. on an 8 hour per day schedule will be considered afternoon shift and a start time between 5:00pm and 11:00pm will be considered graveyard shift for the purpose of determining shift differential.

#### **Holidays**

For each paid holiday, eight (8) hours of straight time pay will be paid to each eligible employee. Employees may supplement the holiday pay hours with available vacation hours or paid personal time.

Regular full-time employees on the payroll as of January 1 will be eligible for 14 paid holidays. Employees hired after January 1 will not be eligible for floating holidays until the following calendar year.

Employees on leave of absence, whether paid or non-paid are ineligible for holiday pay or to reschedule the holiday. Please see the company holiday schedule for designation of observed holidays for your shift.

If a holiday or designated floating holiday falls within a scheduled vacation period, the employee receives 8 hours holiday pay for that day.

ALL full-time employees, not currently on an active leave of absence (including the seven (7) day elimination period), are entitled to holiday pay for company-designated holidays as long as they work the last regularly scheduled day prior to the holiday and the next regularly scheduled day after the holiday. Exceptions to this are:

- Employee is absent either of these days due to a bona fide illness that is verified by a doctor's excuse and is not on a leave of absence or in the seven (7) day elimination period.
- Employees absent for a pre-scheduled personal day the day before or the first work day after a holiday will be eligible for holiday pay.
  - Employees calling in to use a personal day the day before or the first work day after a holiday will not be eligible for holiday pay.
- Layoff on either of these days provided the layoff did not occur more than 14 days prior to the holiday.
- Employee is absent either of these days due to a compensable, on-the-job injury and employee was available for work on the holiday and is not receiving workman's compensation for the holiday.

Vacation pay for all employees is computed at the base rate of pay in effect when vacation begins. For vacation scheduling questions, please refer to your departmental guidelines.

The following outlines the pay practice for holidays worked by employees in hourly paid positions:

#### Holiday Worked

Weekday 1-1/2 plus holiday pay

Saturday 2x's plus holiday pay

Sunday 2x's plus holiday pay

Unscheduled Day 2x's plus holiday pay

Sunday 7th Day 2-1/2 plus holiday pay

Working beyond your scheduled shift into a holiday is considered as a continuation of your shift and is paid at one and one-half times base pay, unless meeting the 7th consecutive day and Sunday double time provision.

#### **Pay Day**

Non-exempt employees are paid biweekly on Thursdays. Paychecks are directly deposited into an employee's designated bank account. As a reminder, employees are responsible for updating changes to their personal information in HOPS.

The Payroll Department will communicate any changes in the scheduled payday if a holiday or other circumstance necessitates a change.

Pay days are subject to change, based on MillerCoors policy.

#### **Pay Calculations**

All pay calculations are factored in three (3) minute increments. Any part of 3 minutes worked is rounded up to the next tenth of hour. Employees receive pay for the day in which the majority of the shift is worked. For shifts having equal hours, those hours are related to the following day.

**Changes in Marital Status or Exemptions**

Changes in an employee's marital status or in the number of exemptions claimed should be reported on the Internal Revenue Service W-4 form and the applicable State form. These forms are available online in [Ceridian](#).

**Company Travel**

Employees traveling for more than two days are normally placed on a Monday-Friday daylight schedule for the travel week.

Non-exempt employees required to travel for more than one day are paid straight time for the time spent traveling during their normal working hours, whether it is a scheduled workday or not. Hours of travel that begin or extend beyond the employee's normal work hours are not compensated.

Non-exempt employees traveling for only one day are paid for all time spent traveling, even beyond normal work hours.

Employees on a ten (10) or twelve (12) hour schedule are placed on a 40-hour daylight shift while on Company travel for more than one day.

**Pay Guidelines for Non-Exempt Employees Attending Training and Work-Related Events**

These guidelines are a reference tool to ensure non-exempt employees are paid properly for travel to and time spent at special work-related events, such as the Annual Safety Meeting or D&I Summit.

**Travel Time**

When non-exempt employees are assigned overnight travel to a work-related training or meeting, the employee must be paid for travel time during the employee's normal working hours on the employee's regular workday and for travel time during the employee's corresponding hours on non-working days. However, if the employee is a passenger on an airplane, train, boat, bus or automobile outside of the employee's regular working hours, the time is not considered work time and is not compensable. Conversely, if the employee is the driver, he is "working" while driving and must be paid other than for bona fide meal periods. If an employee is offered public transportation but requests permission instead to drive his car, MillerCoors may pay him for either the time spent driving or the time he would have had to count as hours worked during working hours if the employee had used the public transportation.

Example:

- A Shenandoah employee regularly works from 7 a.m. to 3 p.m. Monday through Friday. He travels to Milwaukee for Annual Safety Meeting via plane and taxi on Sunday from 1 p.m. to 6 p.m. He must be paid for 2 hours of travel time on Sunday (1-3 p.m.) but not for the time spent as a passenger outside of his regular working hours.

**Training and Meeting Time**

Hourly employees must be paid for attending mandatory job-related training and/or meetings. However, the employee need not be paid for training sessions or meetings if all of the following four factors are met because the event:

- is outside of the employees regular working hours,
- is voluntary,
- is not directly related to the employee's job (i.e., is only incidentally designed to improve the employee's job performance or prepare the employee for



- advancement), *and*
- is not designed for the employee to perform any productive work on behalf of MillerCoors.

**Examples:**

- An employee voluntarily elects to attend an evening dinner event at D&I Summit. His time spent at the dinner is not compensable.
- An employee's manager tells him that he must attend the beer tasting dinner in the Caves at Annual Safety Meeting. His time spent at the dinner is compensable.

**On-the-job accident**

Employees who sustain a job-related injury or illness are paid for all hours they were scheduled to work on the day of the injury. Subsequent absence related to the injury is paid in accordance with workman's compensation provisions as applicable.

Upon returning to work employees are paid for work time missed while receiving treatment for either work-related illness or injury.

**Voting Time**

Upon request, an employee who is registered to vote may receive up to two hours off without pay, if the employee's shift begins less than two hours after the opening of the polls and ends less than two hours before the closing of the polls. The employee is expected to make voting arrangements with their Process Leader or Manager at least forty-eight (48) hours before Election Day.

**Other Pay Issues**

Employees participating in company sponsored groups such as Diversity Councils will be paid for regular meetings. Time spent beyond regular meetings (e.g. event preparation or event attendance) is unpaid.

Employees on a leave of absence are placed on a 40-hour daylight shift while on leave of absence.

Pay increases are not granted while an employee is on medical leave or restricted duty. Such increases are implemented effective when the employee returns to full duty. Delayed increases are not retroactive.

The provisions of a specific incentive plan determine incentive pay while on leave.

**RECORDING POLICY** (see Tap Room>Policies & Guidelines>Policies)

MillerCoors prohibits audio recording, videotaping or otherwise recording a work-related conversation or meeting without the other employee(s) knowledge and advance permission, MillerCoors also prohibits taking photographs or video in the workplace without approval by management.

**RELIGIOUS ACCOMMODATION**

MillerCoors will reasonably accommodate employees' sincerely held religious practices unless doing so would impose an undue hardship on MillerCoors. A reasonable religious accommodation is any adjustment to the work environment that will allow the employee to practice his/her religion. An employee who is seeking a religious accommodation should contact the Human Resources Department.

## **SAFETY AND HEALTH**

### **Responsibility**

#### ***Safety is everyone's job!***

It is the basic responsibility of MillerCoors to provide a safe work environment to minimize the possibility of personal injuries to employees. It is the responsibility of employees to perform their jobs in a safe and responsible manner to avoid injury to themselves and their co-workers.

- Recognize the hazards that may cause injury to you and others.
- Think about what you are doing and the possible consequences of your actions.
- Follow the Safety Rules.
- Make sure that you understand safe operating procedures and do not shortcut them.
- Inform your supervisor of potential safety hazards.
- Inform Human Resources or Plant Manager if, for some reason, a safety hazard does not get prompt attention.

Safety training will be provided to employees on general safety practices that affect all employees and specific safety training that may affect only certain employees, i.e. operation of an industrial truck, confined spaces, lock-out tag-out try-out, etc. All employees are expected to comply with the procedures and rules outlined in all safety training courses.

Accident prevention, good housekeeping, quality, and productivity go hand in hand. Under no circumstances should an employee operate equipment without the proper personal protective equipment or without the safety guards in place.

Safety on the job is common sense! Failure to comply with safe practices can cause injury to yourself or a co-worker.

### **Workplace Injuries and Illness**

All workplace injuries and illness must be reported to your Process Leader, Manager or Security immediately.

The Process Leader or Manager will see that medical attention is provided if needed, complete the required reports, and take the necessary steps to correct any unsafe conditions that may have contributed to the incident. Your Process Leader or Manager is required to provide the Plant Manager and Safety Manager with a written report before the end of the work shift in which the incident occurs. Failure to notify your Process Leader or Manager of an incident immediately may result in a denial of benefits and disciplinary action.

### **Medical Treatment**

Medical treatment as a result of a workplace injury or illness must be coordinated through MillerCoors as part of our Worker's Compensation program, which is provided at no cost to the employee

### **Safety Work Rules and Guidelines**

- PPE (steel toes, bump caps, ear plugs and approved safety glasses with side shields) are required in all areas of production. This includes aisle ways and the mezzanine. No open toed shoes.
- No jewelry of any kind (includes watches, rings, earrings, necklaces, visible piercing, etc.).

	<ul style="list-style-type: none"> <li>• Hair past shoulder length should be restrained in production areas.</li> <li>• Shirttails must be tucked in.</li> <li>• The appropriate gloves (i.e. Kevlar or Leather) are required when hands are at risk (i.e. when handling glass, working with glue, handling strapping, working with debris, clearing jams, handling kegs, etc. (refer to specific JSA's).</li> <li>• Aprons, approved long rubber gloves, face shield/goggles required when handling chemicals.</li> <li>• Wear proper PPE when adding water to batteries (i.e. face shield, rubber gloves, and aprons).</li> <li>• Refer to JSA's and MSDS for individual chemical information.</li> <li>• No shorts, capri pants, sleeveless shirts (shirts must have 4" sleeve) allowed.</li> <li>• Pedestrian traffic must use demarcated aisle ways, if available, when traveling.</li> <li>• Pedestrian aisle ways must remain free of hoppers, materials, parked bicycles or fork trucks.</li> <li>• Wear high-visibility vests when required by risk assessment in high vehicle traffic areas or restricted areas.</li> <li>• Adhere to the "Arm's Length Rule (2') from any powered industrial truck in operation.</li> <li>• Check overhead dome mirrors and never take short cuts through restricted areas.</li> <li>• Fork trucks and man-lifts shall be operated only by certified operators.</li> <li>• The use of cell phones while operating a fork lift is prohibited.</li> <li>• Fork truck inspections must be done and sheets filled out prior to fork truck operation.</li> <li>• Horns to be used frequently when operating fork trucks, especially near doorways, crosswalks, probable pedestrian traffic areas, and whenever in reverse.</li> <li>• When crossing the solid orange lines in the warehouse you are required to yield the right of way at all times.</li> <li>• Seat belts must be worn at all times while operating fork trucks.</li> <li>• Parking brakes are required to be engaged when fork truck is exited by operator.</li> <li>• Always be aware of pedestrian traffic.</li> <li>• When using a chock, place the chock in front of the most forward wheel on the driver's side of the trailer. Be aware of truck traffic when chocking.</li> <li>• Check dock hitches to verify trailers are hitched prior to entry.</li> <li>• Use the support arms on the rail dock plates.</li> <li>• Be cautious of rail traffic when working outside rail docks or crossing to packaging</li> <li>• E-stops and/or proper lock-out, tag-out, and try-out procedures must be followed when working on machinery.</li> <li>• Safety devices and guards must be used where provided. They will not be removed, adjusted, or tampered with after machine is set-up.</li> <li>• No standing on conveyors allowed.</li> <li>• Electrical cabinets may only be entered by trained and properly equipped personnel.</li> <li>• Personnel must be aware of evacuation procedures and proper gathering locations both on and off site. Always be aware of your nearest exit.</li> <li>• Refer to job and area specific JSA's for any additional safety requirements or precautions.</li> <li>• Each employee must participate in a team safety initiative and conduct at least two Behavioral Observations or other approved safety participation each period.</li> <li>• Compressed air shall not be used to clean clothing or any part of the body.</li> <li>• Exit routes, fire-fighting equipment, electric panels, and aisle ways shall be kept clear at all times.</li> <li>• Any accidents, near misses, or property damage should be immediately reported</li> </ul>
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	<p>to a Team Leader/Manager or Safety and Security personnel.</p> <ul style="list-style-type: none"> <li>• Immediately report all dangerous conditions, unsafe practices, malfunctioning equipment, and worn or defective tools to your supervisor.</li> <li>• Any smell of ammonia shall be reported to Safety and Security personnel.</li> </ul> <p><b><u>SEARCHES POLICY</u></b> (see Tap Room&gt;Policies &amp; Guidelines&gt;Policies)</p> <p><b><u>SENIORITY</u></b></p> <p>MillerCoors seniority starts on an employee's most recent date of regular full-time service with MillerCoors or on the date of purchase with any company purchased by MillerCoors.</p> <p>Regular full-time employees previously employed by MillerCoors or any other MillerCoors company who return after a break in service, are given credit for the previous service only in connection with service awards. Service credits for the retirement plan and the savings &amp; investment plan are determined by the provisions of the respective plan documents.</p> <p>Temporary employees who become regular full-time employees of MillerCoors receive no seniority for time worked as a temporary employee.</p> <p>Same day hires will be given MillerCoors seniority ranking based on the last four digits of their Social Security number. The employee with the lowest four digits will be given the greatest seniority status.</p> <p>Employees on layoff, workers compensation leave, or medical leave accrue MillerCoors seniority for up to two years or length of service, whichever is less. Employees on leave for greater than six-months but returning prior to two years will be returned to a position based on seniority, skills and abilities.</p> <p>Seniority shall be lost and employment terminated for any of the following reasons:</p> <ol style="list-style-type: none"> <li>1. If the employee quits/resigns.</li> <li>2. If the employee is discharged.</li> <li>3. If the employee has failed to return from a leave of absence as scheduled, resulting in termination.</li> <li>4. If the employee fails to report from layoff within three (3) days after being notified at the employee's last address on company records, resulting in termination.</li> <li>5. If the employee is out of work for any period of time equal to his/her length of continuous service or two years, whichever is less.</li> <li>6. An employee retires under the terms and conditions of the retirement program.</li> </ol> <p>If seniority is broken for the reasons listed above and you are rehired, you will be considered a new hire with a new seniority date. Plant seniority is determined by your most recent date of hire with the Company.</p> <p><b><u>SEVERANCE POLICY - MILLERCOORS</u></b> (see Tap Room&gt;Policies &amp; Guidelines&gt;Policies)</p> <p><b><u>SICK LEAVE AND SHORT TERM DISABILITY POLICY</u></b> (see Tap Room&gt;Policies &amp; Guidelines&gt;Policies)</p> <p>The Shenandoah Brewery Sick Leave Policy has been enhanced to allow utilization of twenty-four (24) hours of the sixty-four (64) of sick leave for personal reasons to provide the most flexibility to employees while being respectful to the Team.</p> <ul style="list-style-type: none"> <li>• Employees pre-scheduling the use of the twenty-four hours personal time will not</li> </ul>
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	<p>incur a chargeable absence and will not be excluded from perfect attendance recognition for the absence. Pre-scheduling must be completed early enough to allow the Process Leader/Manager to arrange coverage if needed.</p> <ul style="list-style-type: none"> <li>• Non-scheduled use of the twenty-four hours personal time will result in attendance occurrences per the Attendance Policy and will exclude the employee from perfect attendance recognition.</li> <li>• Personal time cannot be used for an unscheduled work day or to avoid forced overtime.</li> <li>• The time must be taken in minimum of one (1) hour increments.</li> <li>• Scheduling for use of Personal Time falls outside of Vacation Scheduling.</li> <li>• Call-ins before or after a holiday will result in loss of holiday pay.</li> </ul> <p><b>Long-Term Disability Policy</b>  Employees who have exceeded their short-term disability period (180 days) may be eligible for Long-Term Disability benefits. They may initiate the application process by contacting the Reed Group at 1-866-205-9809.</p> <p>An employee who qualifies for Long-Term Disability will be placed on inactive status. In the event the employee is medically released and able to return to work within two years, or a period equal to his/her length of service, whichever is less, from the commencement of their Short-Term Disability illness/injury, the employee shall be restored to his/her former position or a comparable position at the same rate of pay unless circumstances have changed so as to make it impossible or unreasonable to reinstate the employee.</p> <p>Employees returning to active duty work from a Long Term Disability leave will accrue vacation for time worked after returning to active duty. Additionally they will accrue vacation time during the period of Short Term Disability leave.</p> <p><b><u>SMOKING POLICY</u></b> (see Tap Room&gt;Policies &amp; Guidelines&gt;Policies)</p> <p>Because the use and disposal of tobacco products in non-approved areas present safety and health issues, and is a violation of Good Manufacturing Practices, smoking and the use of smokeless tobacco products including e-cigarettes, is prohibited in all production and work areas, meeting rooms, offices, lunch rooms, and Company owned or leased vehicles. Personal hygiene practices require that hands be washed after tobacco use, prior to returning to the work area.</p> <p>Designated smoking areas must be used for smoking and smokeless tobacco products.</p> <p>Certain areas in Brewing and the Waste Water Treatment Plant have been identified as intrinsically safe areas, thus no one is allowed to have cigarettes, matches, or lighters on their person or in tool bags while working or passing through these areas.</p> <p>The Company does not recognize or condone “smoke breaks” as a reason for time away from job responsibilities apart from approved break and lunch periods.</p> <p><b><u>SOCIAL MEDIA GUIDELINES</u></b> (see Tap Room&gt;Policies &amp; Guidelines&gt;Policies)</p> <p><b><u>SOLICITATION POLICY</u></b> (see Tap Room&gt;Policies &amp; Guidelines&gt;Policies)</p> <p><b><u>VACATION POLICY</u></b> (see Tap Room&gt;Policies &amp; Guidelines&gt;Policies)</p> <ul style="list-style-type: none"> <li>• Vacation will be scheduled and taken hour for hour. Employees with a vacation hour balance of less than a full-shift may combine the vacation hours with personal time, holiday time, or utilize for a partial day of vacation subject to the Process Leader/Manager’s approval.</li> </ul>
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- Preference for vacation scheduling is based on MillerCoors seniority. Specific vacation scheduling will be determined by department procedures. Each department is responsible for establishing and administering vacation scheduling practices that are both economically and operationally prudent. The establishment of vacation scheduling practices is to be accomplished with input from affected employees in accordance with our participative management philosophy.
- When selecting vacations, a “Full-Week” means Monday through Sunday.

**WORKPLACE VIOLENCE PREVENTION POLICY** (see Tap Room>Policies & Guidelines>Policies)

### **WORK RULES AND CORRECTIVE DISCIPLINE**

This policy sets forth common work and personal conduct rules for employees of the Company. The rules are designed for consistency and to give the employees an understanding of what is expected by the Company. These work rules are reviewed periodically and changed, if necessary, according to the needs of the Company and its employees. All personnel policies supersede any department policies or practices. Process Leaders or Managers counsel employees on potential problems. Corrective discipline is designed for the Process Leader or Manager and employee to correct performance problems. If problems are not corrected, progressive discipline continues up through and including termination. See also the section on policy/performance offenses, first offense terminations and the MillerCoors **Code of Business Conduct Policy**.

It is not practical to have a rule to cover every situation that might arise. As a general rule, you should not engage in activity that interferes with your own work, or the work of others; endangers the health and safety of yourself or others; interferes with the normal operating procedures of the plant; interferes with the maintenance or order on the premises; interferes with the compliance with local, state and federal regulations.

In most circumstances, the company will utilize a progressive disciplinary procedure to correct and/or address unsatisfactory work performance, violations of company rules, or inappropriate conduct. In cases of serious misconduct, the company may start at the appropriate step warranted by the severity of the behavior. The following are examples of situations subject to disciplinary actions, up to and including discharge.

- Job performance problems such as errors, lack of skills to perform job functions, not meeting set objectives, not following procedures, break abuse, etc.
- Violation or disregard of safety policies, requirements, rules or regulations or use of required PPE.
- Unauthorized possession of Company property or the property of other personnel.
- Unauthorized use of Company equipment, tools, or materials for projects of a personal nature.
- Use of abusive, obscene, or indecent language or behavior on company or customer's property.
- Disruptive or disrespectful behavior and inability to work collaboratively with team members.
- Inattentive performance of job assignments.
- Repeated and frequent unauthorized rest periods or returning to work late from a break or lunch period.
- Eating while working in operational or lab areas. Food or drinks are not permitted in operation areas.
- Violation of Good Manufacturing Procedures (GMP).
- Unauthorized entry to Company property or entering or leaving Company



	<p>property or buildings by other than designated entry or exit routes.</p> <ul style="list-style-type: none"> <li>• Failure to keep assigned work areas clean and orderly, and free from hazards or waste.</li> <li>• Careless use of or unsafe operations of personal vehicles on Company property.</li> <li>• Careless use or operation of equipment.</li> <li>• Use of cell phones, cameras, or other electronic devices for personal use on the production floor, while operating a fork truck, or driving a Company vehicle.</li> </ul> <p><b>Corrective Discipline</b> Corrective discipline steps are:</p> <ul style="list-style-type: none"> <li>• a first written agreement for the first offense</li> <li>• a final written agreement for the second offense</li> <li>• discharge for the third offense</li> </ul> <p>Disciplinary actions for absenteeism and policy/performance offenses are administered separately.</p> <p>The Company reserves the right to impose the level of discipline it believes is appropriate after considering the facts and circumstances.</p> <p>Corrective discipline is based on discipline received in the last 12-month period. Process Leaders and Managers are expected to assess an employee's entire work history before issuing discipline.</p> <p><b>Absences and Tardies</b> Regular and reliable attendance are an essential function of the job. Employees may receive discipline for excessive absenteeism. Every employee has a responsibility to maintain a good attendance record.</p> <p>Absences and tardies are subject to progressive discipline.</p> <p><b>Absence</b> An absence is one or more consecutive workdays missed for the same cause. Non-consecutive days are considered separate and unrelated absences. In cases where the employee has separate but related absences as a result of an unsuccessful attempt to return to work or to continue treatment, the Process Leader or Manager may consider these absences as one. All absences, regardless of the reason, are counted and documented in the employee's file, by the Process Leader or Manager.</p> <p><b>Tardy</b> A tardy is defined as any absence less than half a shift missed and is considered half an absence. Two tardies equal one absence. Any absence equal to or greater than half a shift is considered a full absence.</p> <p><b>Habitual Absence/Tardy</b> Habitual Absence/Tardy is defined as an established pattern of absences over a 12-month period. For example, absences or tardies which occur immediately before or immediately after scheduled days off/vacation; all absences involving multiple days; absences that are always last or first day of graveyard.</p> <p><b>Irresponsible Absence/Tardy</b> Irresponsible Absence/Tardy is defined as a verifiable absence or tardy which demonstrates a lack of concern for Company interests or regard for fellow employees; e.g. employee calls in or leaves early for another job; employee calls in at the last minute when reason for absence was known well in advance; employee takes time off to conduct activities that could be performed on their normal day off; employee requests a</p>
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day off but request is denied and employee then calls in sick for that day. Note: if employee requests a day off and the request is denied and the employee advises the Process Leader or Manager that he/she will still be absent, then only a normal incident will be charged since overtime coverage can be scheduled.

The 48-hour rule applies to a situation where multiple days of work are missed in a chronic pattern.

### **AWOL**

AWOL is defined as failure to call in within the first 2 hours of the shift or to get prior permission when absent on a scheduled workday. Each day of AWOL is treated as a separate absence. AWOL also includes leaving work without permission. One AWOL causes an employee to be subject to a final written warning; 2 in any 12-month period causes an employee to be subject to termination.

### **Corrective Discipline**

Corrective discipline may be taken for excessive absence as follows:

First Written Agreement for:

- 3 absences in a 3 month period or
- 6 absences in a 12 month period or
- more than 48 hrs. in 6 months or
- 3 habitual absences/tardies within 12 months or
- 1 irresponsible absence/tardy

Final Written Agreement within 12 months of first written agreement for:

- 2 absences in a 4 month period or
- 4 absences in 12 months or
- more than 48 hrs. in 6 months or
- 3 habitual absences/tardies within 12 months or
- 1 irresponsible absence/tardy within 12 months or
- 1 AWOL

Termination within 12 months of final written agreement for:

- 2 absences in a 5 month period or
- 3 absences in 12 months or
- more than 48 hrs. in 6 months or
- 3 habitual absences/tardies within 12 months or
- 1 irresponsible absence/tardy within 12 months or
- 1 AWOL within 12 mos. after final agreement for absenteeism or
- 2 AWOLs within 12 months

### **Performance Probation**

If at any time an employee's performance falls to an overall rating below "Successful Performance" (SP), the immediate Process Leader may meet with the individual to develop a performance improvement plan. The employee is responsible for bringing his/her performance to a "Successful Performance" (SP) rating. Also, if an employee receives below a "Successful Performance" (SP) rating on any of their key accountabilities, they may also be placed on a performance improvement plan.

A performance improvement plan is not discipline and therefore, may not be appealed. The actual period of the performance improvement plan can vary. It will be established by the Process Leader or Manager and, in most cases, it will not last more than 90 days. If at any time during the performance improvement plan the employee's performance declines or shows insufficient improvement, the employee may be placed directly on performance probation. Employees who do not bring their performance up to a

	<p>“Successful Performance” (SP) level while on a performance improvement plan will be placed on performance probation. Employees may receive a performance review at any time.</p> <p>If an employee fails to achieve a “Successful Performance” (SP) rating during their performance improvement plan or if performance problems are serious or have negative consequences on the department, customer relations or the business, an employee may be placed directly on performance probation.</p> <p>Performance probation is considered a final written warning. The employee is given written notice of the probationary period, including reasons for the probation and what must be done to achieve a “Successful Performance” (SP) performance standing. The actual period of performance probation can vary. It will be established by the Process Leader or Manager and, in most cases, it will not last more than 90 days. A good performance standing (SP rating) must be achieved by the end of the probationary period. If, during the employee's probationary period performance declines or shows insufficient improvement, termination may occur before the end of the probationary period. As with all discipline, it remains in effect for a 12-month period from the time the employee is placed on performance probation. Anyone who is on performance probation should receive a performance review approximately every month until performance improves to at least a “Successful Performance” (SP) level.</p> <p><b>First Offense Terminations</b></p> <p>Some violations are so serious that the first offense warrants termination.</p> <p>An employee may be placed on a paid leave in order to investigate an incident or issue in question. The Process Leader or Manager has discretion in issuing a disciplinary suspension without pay in lieu of discharge. Disciplinary suspensions are considered a final warning and, depending on the employee's work schedule, can be up to 10 scheduled working days without pay (up to 84 hours of pay).</p> <p>If the offense is a violation of the federal or state criminal code and the facts warrant, the case may be referred to law enforcement authorities.</p> <p>Violations subject to immediate termination include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• Falsification of Company records.</li> <li>• Stealing - taking property of the Company or another person without permission; taking of Company information, expense report fraud or misuse of Company credit card or Pro-Card.</li> <li>• Provocation of a fight - harassing, abusing, assaulting, or threatening another person, or exhibiting intimidating behavior.</li> <li>• Retaliatory acts - any attempt, successful or unsuccessful, to abuse, threaten or harm another employee; causing damage to or loss of property to gain revenge or retribution for the legitimate actions or perceived actions of the victim. This includes retaliation for use of the appeal system and of the discrimination and sexual harassment or EEO complaint procedures or for reporting a violation of the Code of Conduct, including such matters as accounting or auditing irregularities, fraud, environmental violations or health and safety issues.</li> <li>• Dishonesty - includes acts such as cheating or defrauding the Company; making or supplying false statements or information; lying to supervision on job-related matters or during Company investigations.</li> <li>• Engaging in sabotage or a slowdown or illegal strike/picketing activity.</li> <li>• Gross misconduct/negligence - destruction of property; deliberate violation of Company/Plant/Department policies, procedures or instructions; violation of any laws or regulations; sleeping on the job; intentional creation of unsanitary conditions; horseplay; failure to follow lock-out/tag-out/try-out procedures or</li> </ul>
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	<p>other safety instructions; unauthorized removal of lock-out tags; violations of software copyright laws; making disparaging remarks about Company products; acting disrespectfully toward customers or visitors on Company premises; misuse of Company information.</p> <ul style="list-style-type: none"> <li>• Weapons possession on Company premises - carrying weapons or explosives while on Company property and/or into Company buildings. (Exceptions include: Security officers or police officers carrying weapons in performance of their duties; employees carrying knives with a blade length less than two (2) inches, unless authorized by the Company for use in performance of their job duties; and Company weapon collections).</li> <li>• Code of Conduct violations, insider-trading violations.</li> <li>• Failure to sign affirmations that are a condition of employment (i.e. Code of Conduct).</li> <li>• Falsification/dishonesty/misrepresentation of medical records in relationship to leave of absence; failure to follow recommendations/requests of the case manager while on Medical Leave or Restricted Duty; engaging in activities on or off the job that violate current medical restrictions or any other violations of the <u>Sick Leave and Short Term Disability Policy</u>.</li> <li>• Insubordination - refusal or failure to perform assigned work or to follow most recent orders, including acts of disrespect to person(s) with assigned authority.</li> </ul> <p>Employees also have a responsibility to become familiar with the MillerCoors policies posted on the Tap room such as the Discrimination and Harassment Free Work Environment and Drug Free Workplace policies, which also guide individual behaviors. Violations of those policies may also result in a first-offense termination.</p> <p>All employees who have completed their probationary period (i.e. their first 90 days of employment) and feel they have received unjust disciplinary action may use the Conflict Resolution Procedure as detailed above.</p> <p><b><u>WORK SCHEDULES</u></b></p> <p>Work schedules are planned to satisfy our customer's demands. The Company reserves the right to change starting and ending times or to add shifts in order to accommodate our customer or to operate more efficiently.</p> <p>The work week begins with the first shift on Monday (which may begin on Sunday evening) and ends at the end of the day on Sunday.</p> <p><b>Schedule Changes</b></p> <p>The Brewery's procedure on Schedule Changes focuses on the balance of the Company's business needs and its team members' personal needs. We recognize our team members' need to be able to plan their days off and their need to be fairly compensated. The Brewery has a need to maintain flexibility and a responsibility to contain its operating costs.</p> <p>There are two types of Schedule Changes: Voluntary &amp; Non-voluntary.</p> <p><b><u>Voluntary Schedule Changes</u></b></p> <ul style="list-style-type: none"> <li>• Employees may trade work days with other team members as long as the trade does not result in additional wage costs and they receive prior approval from their Process Leader, Manager, or designee.</li> <li>• Work may be shifted from the weekend to weekdays when possible to create an opportunity for voluntary schedule changes; this leaves desirable weekend time off.</li> </ul>
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	<p><u>Non-voluntary Schedule Changes</u></p> <ul style="list-style-type: none"> <li>• Employees shall receive 96 hours notice prior to changes in work schedule or will be paid at the overtime rate.</li> <li>• Non-voluntary Schedule Changes may be utilized as follows: <ul style="list-style-type: none"> <li>○ Required company travel for more than 1 day (reference Shenandoah Pay Policy, Company Travel).</li> <li>○ Meetings, Training or Events lasting 4 hours or more.</li> <li>○ Number of employees that sign up for voluntary schedule change does not meet staffing needs.</li> </ul> </li> </ul> <p><u>Schedule Changes and Pay:</u></p> <ul style="list-style-type: none"> <li>• Without 96 hours notice: All time worked on a non-scheduled day will be paid at the overtime (1 ½) rate.</li> <li>• With 96 hours notice: Proper notice preempts pay practice listed above. Overtime will be paid for any hours worked in excess of 40 hours in a work week.</li> </ul> <p><u>Overtime Scheduling</u></p> <p>Overtime assignments, voluntary and forced, will be made by the utilization of overtime scheduling lists to best equalize overtime within the team and department. Please refer to your department Overtime Guidelines for details.</p>
<b>Accountability:</b>	<p>Human Resources is responsible for issuing and updating this policy as necessary to comply with applicable laws and MillerCoors policies. Human Resources is the sole interpreter of this policy.</p> <p><b>Nothing in this Supplemental Policy Guide may be construed as modifying the At-Will Employment policy, which is incorporated by reference. As with all MillerCoors policies and practices, this policy: a) is subject to interpretation, change, or elimination, in management's discretion, at any time, with or without prior notice; and b) does not create contractual rights or alter an employee's at-will status.</b></p>
<b>Contact:</b>	Your HR Representative



 MillerCoors  
CODE of BUSINESS  
CONDUCT



**A**t MillerCoors, quality is at the heart of everything we do. It's what we believe in and what we stand for, and it all starts with quality people. We will win in beer when each and every one of us holds ourselves accountable and takes quality personally.

Our Code of Business Conduct reflects our commitment to doing things the right way. It helps bring to life our values, principles and expectations of how we do business – to always do what is right. Integrity is foundational to winning in beer, and that is why the Code applies to all of us and violations are not tolerated. Managers have an added responsibility to lead by example and ensure our Code is followed by the teams they lead.

Our Code is always available through [The Tap Room](#), so you can review it when faced with difficult decisions or situations. It does not cover every situation and is not a substitute for good judgment and common sense, so you're also encouraged to have open and direct conversations with your manager, your HR manager or a member of the Business Integrity team, so we can stay focused on doing the right things. And, if you ever feel you can't express concerns to members of your team, you can make a report by phone using the toll-free Helpline or on the internet at [www.MillerCoors.EthicsPoint.com](http://www.MillerCoors.EthicsPoint.com). We will protect you from retaliation when you make a good faith report.

By demonstrating our commitment to our Code and helping each other win the right way, we will exceed the expectations of our customers, delight our beer-loving consumers and create America's best beer company.

**Gavin Hattersley**  
Chief Executive Officer



...nning the right way starts  
...reflect discipline, decisiveness  
...haviors in our daily work  
...ur growth – as individuals,  
...hese values embody the  
...ed as a company, integrity is  
...t be present in all that we do.  
...beer and cider, driven by our





- 1 **A message from Gavin Hattersley**
- 2 **Our guiding principles**

- 6 **Winning the right way**
- 7 We're all in this together
- 7 Leading the right way
- 7 Violation consequences
- 8 Making winning choices

- 10 **Speaking up is the right way**
- 13 Resolving your concerns
- 13 We are protected from retaliation
- 14 The process

- 18 **Winning with our people**
- 19 We treat each other with respect
- 20 We champion workplace safety and s
- 21 We avoid conflicts of interest
- 26 We safeguard company resources
- 27 We use technology appropriately
- 28 We manage records and information
- 29 We respond to inquiries and requests
- 30 We prevent insider trading

- 32 **Winning with our society and resour**
- 33 We support responsible consumption
- 34 We are committed to the environmen
- 34 We invest in communities
- 35 We embrace ethics and transparency

- 36 **Winning with our distributors and re**
- 37 We compete fairly
- 38 We protect others' data

- 40 **Winning with our consumers**
- 41 We sell and market responsibly
- 41 We ensure product quality
- 42 We protect consumer information

- 44 **Waivers**





# Winning THE RIGHT WAY

**T**o create America's best beer company, we must do business the right way. Most of the time, our instincts and common sense lead us to make good decisions. From time to time, though, we all need guidance. On these occasions, our Code gives us direction for making the right decisions, even in complex situations.

Acting according to the principles in our Code also helps us maintain the trust and respect we have built with our stakeholders – including our consumers, retailers, distributors, suppliers, communities and each other. We have a great responsibility to all of our stakeholders, and the strength of these relationships is important to our business success.

### We're all in this together

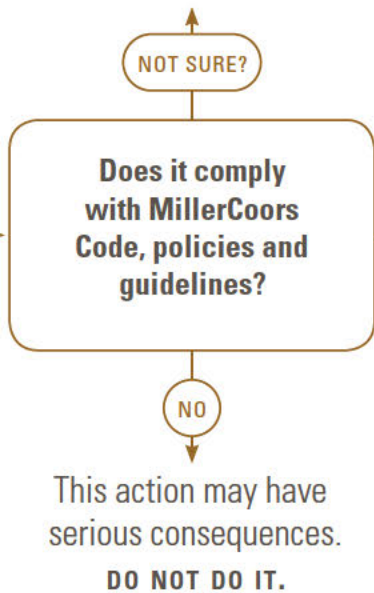
We are all responsible for understanding and following the Code, MillerCoors policies and guidelines, and the law. We also all share a responsibility to speak up about any known or suspected violation of the Code, Company policies and guidelines, or the law. Failure to do so will result in disciplinary action, which may include termination.

The principles in our Code apply to all officers, directors and employees of MillerCoors, its subsidiaries and affiliates. We also expect anyone working on behalf of our Company – including consultants, contractors and temporary employees – to meet our high ethical standards. In addition, we avoid working with any third parties who engage in practices that violate our principles.

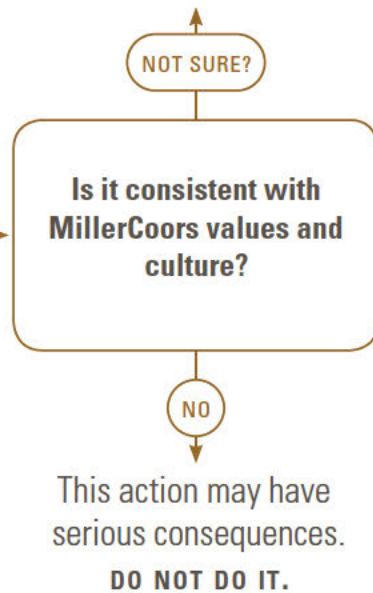
**"Relationships are built on trust and respect."**



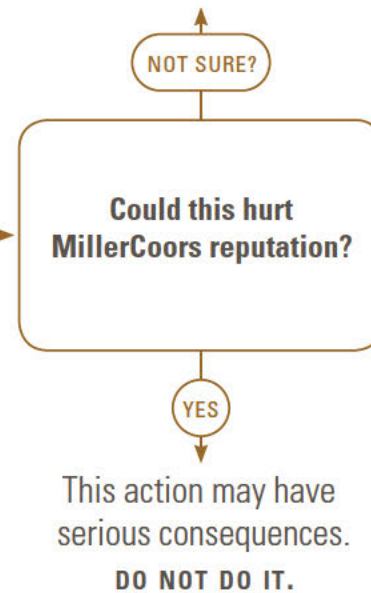
Check Policies & Guidelines for more information. Talk to your manager, HR or Business Integrity for guidance.



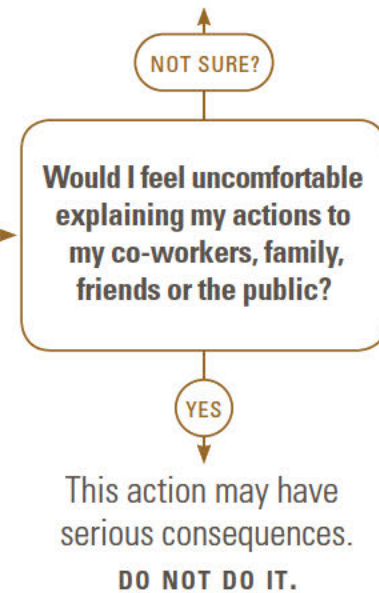
Talk to your manager, HR or Business Integrity for guidance.



Talk to your manager, HR, Legal or Business Integrity for guidance.



Talk to your manager, HR, Legal or Business Integrity for guidance.







# AKING UP THE RIGHT WAY

**S**peaking up is the right way to demonstrate our commitment to integrity and our values and to protect ourselves and MillerCoors from action that could harm our reputation and continued success.

We all share a responsibility to speak up about any concern as we notice it. This allows MillerCoors to resolve a possible issue before it becomes widespread, to correct problems, to identify areas that require improvement or additional training, and to make this a better place to work for all of us.

If you think there has been a violation of the law, regulations, our policies or other Company policies and guidelines, you should speak up as soon as possible. You are encouraged to turn to your immediate manager first if you are comfortable doing so. You can also speak up to any of the following:

- **Human Resources**
- **Business Integrity team:** [businessintegrity@millercoors.com](mailto:businessintegrity@millercoors.com)
  - **Dave Osswald:** 414-931-2176 or [david.osswald@millercoors.com](mailto:david.osswald@millercoors.com)
  - **Lisa Quezada:** 414-931-6452 or [lisa.quezada@millercoors.com](mailto:lisa.quezada@millercoors.com)
- **Legal**
- **Internal Audit** (for reports concerning internal controls and accounting practices)
- **Security:** 1-866-711-7272 (24/7)
- **MillerCoors Business Integrity Helpline:** 1-888-278-1496 or [www.MillerCoors.EthicsPoint.com](http://www.MillerCoors.EthicsPoint.com)



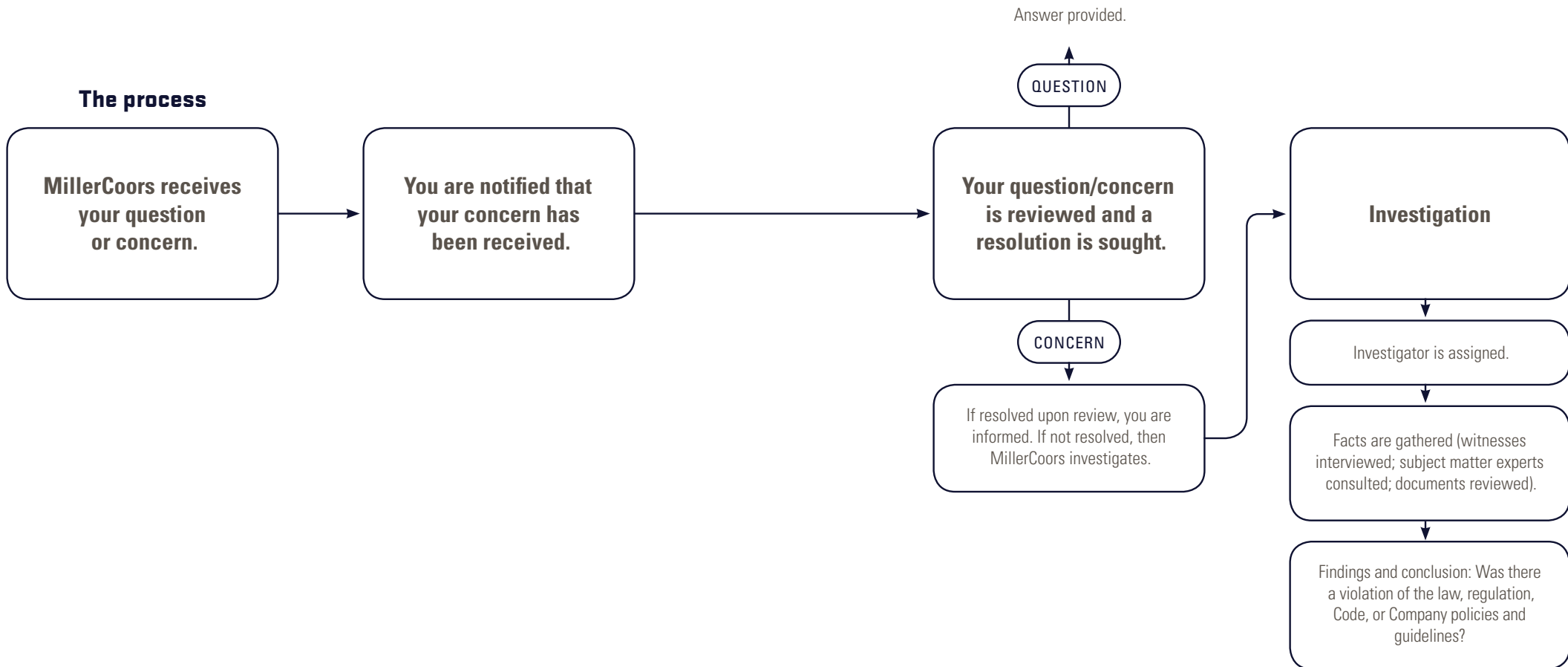
## Resolving your concerns

MillerCoors treats all concerns, questions and complaints seriously, and will promptly, thoroughly and fairly investigate all reports, taking appropriate action whenever necessary. We confidentially handle all reports, only sharing information on a "need to know" basis. We make every reasonable effort to protect your identity if you wish to remain anonymous, except as required by law. Keep in mind, though, that providing your name along with a report will assist any investigation that follows.

EthicsPoint is an independent company that administers the MillerCoors [Business Integrity Helpline](#) and will notify the [Business Integrity team](#) when a report is made and facilitates communication between you and the Business Integrity team.

When using the Helpline to make a report, you have a responsibility to follow up and respond to our requests for additional information needed to help with our investigation into the concerns raised. This follow-up is especially important when making anonymous reports, as the Helpline will be the only way for the Business Integrity team to communicate with you.

## The process





## Ask questions and raise concerns

### Have a question? Consult:

- Code of Business Conduct
- [Business Integrity Tap Room page](#)
- Manager
- HR manager or Legal
- [Business Integrity](#)
- [Business Integrity Helpline](#)

### To raise a concern, speak to:

- Manager
- HR manager or Legal
- Business Integrity
- Business Integrity Helpline

## What happens if I call the Business Integrity Helpline?

### Ask a question:

- EthicsPoint receives question
- Relays question to Business Integrity
- Business Integrity answers question

### Raise a concern:

- EthicsPoint receives concern
- Relays concern to Business Integrity
- Review/investigation
- If necessary, appropriate action is taken
- Feedback is provided to you

**Question:** I have a concern to raise, but I fear retaliation. Should I be worried?

**Answer:** No. Any person who seeks advice or raises a concern in good faith is doing the right thing. MillerCoors strictly prohibits retaliation against a person for speaking up about suspected violations or participating in any company investigation. If you suspect retaliation against yourself or any other MillerCoors employee for speaking up, you should report your concern.





**C**onnection with people is critical to our success in the beer business. We treat each other with dignity and have a genuine respect for people who help us understand individual differences and the unique contributions we all bring to the team. Our goal is to ensure that each of us can confidently contribute our best. Our differences reflect not only who we are but also who our consumers are.

### **We treat each other with respect**

We value a diverse and inclusive workplace, and we do not tolerate discrimination based on factors such as race, sex, national origin, age, religion, disability, sexual orientation, gender identity, veteran status, marital status or any other trait protected by law.

We must also ensure that our work environment is harassment-free. Unwelcome conduct that could create an intimidating, hostile or offensive work environment has no place at our Company. Harassment can be physical, sexual, verbal or written and can also occur when unwanted videos or pictures are displayed.

*For additional guidance, refer to our [Discrimination and Harassment Free Work Environment Policy](#) and our [Equal Employment Opportunities Policy](#).*

### **We win the right way when we:**

- Treat each other with dignity and respect
- Value and encourage diversity and inclusion
- Strive to ensure a workplace free from harassment
- Report incidents, concerns or reasonable suspicions of discrimination or harassment
- Prevent retaliation against anyone who makes a good-faith report

**Question:** I've noticed that my manager does not assign me any new projects – projects that allow me the opportunity to learn about other areas of the business or improve visibility to senior leaders. She has said to me several times that she doesn't know how I can do my job and take care of a child by myself. She's said it so often it's really made me feel like that's why I'm not given these opportunities. What can I do?

**Answer:** Work assignments are made based on myriad factors – work performance, expertise needed, competencies – to name a few. If you feel you have not been treated fairly, it's important that you speak to your HR manager.

## We champion workplace safety and security

At MillerCoors, our safety is a top priority. That's why we are continuously building an environment of world-class safety. We all have the right to feel safe and secure in our workplace.

Violence, threats of violence and bullying (including cyberbullying) are not permitted at MillerCoors. Similarly, we respect our co-workers' safety by never working while intoxicated from any amount of illegal drugs, alcohol, or misused prescription or over-the-counter medications.

If you have a concern about workplace health and safety, please contact your manager, the local safety manager or Corporate Environment, Health and Safety (EHS). Contact local security or Corporate Security for concerns about security.

**For additional guidance, refer to our [Drug-Free Workplace Policy](#), [Employee Alcohol Policy](#) and [Workplace Violence Policy](#).**

### We win the right way when we:

Follow all environmental, health and safety rules, regulations and procedures, and complete all required EHS training  
Promptly report accidents, incidents, near misses, non-compliance with regulations or anything else posing a risk to health, safety, security and the environment  
Understand the hazards and risks associated with our own jobs and those of our colleagues and integrate environmental, health, safety and security considerations into our day-to-day working activities  
Raise any concerns regarding violence, threats of violence or bullying (including cyberbullying)  
Refrain from working while using illegal drugs, including misused prescription or over-the-counter medications, or being impaired by alcohol

**Question:** I observed a co-worker not wearing proper PPE while working on a bottle line that was not properly locked out. When I brought this to the team's attention, they blew me off, stating that in the time it would take to put on PPE and Lock Out/Tag Out, they'd be done working on the machine. I just want all of us to be safe. What should I do?

**Answer:** At MillerCoors, our safety is a top priority. That's why we have safety rules and procedures in place – to ensure a safe work environment. Failure to follow safety rules and procedures can result in serious injury and even death. Not following safety rules is a violation of the Code and can result in disciplinary action including termination of employment and, in some cases – like this one – is a violation of the law and can result in fines and penalties for the Company. You should immediately report this to your manager or local safety manager so that the situation can be appropriately addressed.

## We avoid conflicts of interest

Our success relies on our ability to act solely with MillerCoors best interests in mind. For that reason, we must avoid conflicts of interest – and even situations that might appear to be conflicts. A “conflict of interest” can arise from any situation when our personal interests (or those of our family or close friends):

- Interfere with our ability to do our job
- Influence our judgment about what's best for MillerCoors
- Affect business outcomes or relationships

### Common conflict of interest scenarios include:

- Having a personal relationship with an employee at a company that competes or does business with MillerCoors
- Having an ownership interest or holding an influential position in a company that competes or does business with MillerCoors
- Holding a public office that may require voting or ruling on an issue that directly relates to MillerCoors
- Competing with our Company or taking personal advantage of opportunities that come our way as a result of our connection to MillerCoors

A few other possible areas of concern are addressed in the sections that follow. Remember that a real or perceived conflict of interest can harm MillerCoors reputation as well as your own.

We owe it to ourselves, our co-workers and our Company to disclose any situation that may lead to an actual or perceived conflict of interest. While it's not a violation of the Code if you have a conflict of interest, it's critical that you promptly disclose it. In most cases, the conflict can be easily resolved. Because it can be hard to sort out what is and is not a potential conflict of interest and the best way to handle it, you should discuss it with your manager and the Business Integrity team.

***For additional guidance, refer to our [Gift and Entertainment Policy](#), [Travel and Expense Policy](#), and [Employment of Relatives Policy](#).***



## **Gifts**

Gifts are items of value, offered without obligation as an expression of appreciation or goodwill. The rules regarding receiving gifts and entertainment also apply to members of our immediate family. Generally, we may not give or accept gifts that meet all of the following guidelines:

- Not cash, gift cards or other cash equivalents,
- Not travel or lodging,
- Not intended or appear to influence a business decision **and**
- Reasonable in value (less than \$250).

Note that the rules for giving gifts to government officials — or their staffs or families — are much stricter and require the prior written approval of the Chief Public Affairs and Communications Officer.

**For additional guidance on entertainment and gifts, refer to our [Gift and Entertainment Policy](#) and our [Travel and Expense Policy](#).**



### **Other employment**

MillerCoors provides employees with competitive wages, but understands that some of us choose to work a second job. However, working for another company could create a conflict of interest. To keep that from happening, we may not take a job that interferes with MillerCoors work. Stay clear of the following to avoid this type of conflict:

- Conducting outside business during working hours
- Using MillerCoors property, equipment or information for another business
- Taking employment with a MillerCoors retailer, supplier, distributor or competitor

**Question:** I'm thinking about taking a part-time job. Is this allowed?

**Answer:** Working for another company could create a conflict of interest. To keep that from happening, you should steer clear of jobs that interfere with MillerCoors work. Don't conduct outside business during work hours or use MillerCoors property, equipment or information for another business or take employment with a MillerCoors retailer, supplier, distributor or competitor. Do let your manager know so that he or she can help you avoid any conflicts of interest. If you need further guidance, contact the Business Integrity team.

### **Business with friends and family**

A conflict of interest can also arise if you, your family member or a close friend is employed by or has a personal financial stake in a company that is a current or potential supplier, distributor, retailer or competitor of MillerCoors. If you discover that you face such a situation, ensure that you avoid using your position to influence our Company's negotiations with that third party. You also have a responsibility to disclose any potential conflict of interest to your manager. If you have a personal relationship with a current or potential business partner and are directly involved in this business partner's selection, then you may have a conflict. Please inform your manager immediately and remove yourself from the selection-making process.

Similarly, a conflict of interest may occur when we supervise (or are supervised by) our family members. MillerCoors avoids making placement decisions that could create this type of conflict. However, if you find yourself working with family or someone with whom you have a close personal relationship, report it to your manager immediately.

### **Corporate opportunities**

Winning the right way means we make unbiased decisions on behalf of MillerCoors. But we can't if we are in competition with our Company. For this reason, we should avoid taking personal advantage of any business or investment opportunities we learn about through our position at MillerCoors. If we learn of a business or investment opportunity we think may be of interest to MillerCoors, we have a duty to pass the information along to our manager.

**Question:** My brother recently married, and my new sister-in-law is a partner in a beer distributorship. Is this a conflict of interest?

**Answer:** Maybe. It's certainly a potential conflict that should be disclosed right away to the Business Integrity team for assessment. A number of things will be considered to determine what to do. You'll be asked how closely you work with the distributor and whether you work with your in-law. It's also important to inform your manager so he or she can help you navigate the potential conflict, that you disclose this during the annual Code affirmation and that you're transparent in all of your interactions.

## We safeguard company resources

We are all responsible for protecting our Company's physical and intangible resources to ensure our continued success growing our brands and our loyal base of consumers. To this end, we protect our confidential and proprietary information, including our trade secrets, intellectual property, information about personnel and organizational changes, sales forecasts, pricing strategies, marketing plans and other information pertaining to strategy. All of this information gives our Company a competitive advantage.

Some of us may also have access to personal information of employees that we must protect. If your job or the project you're working on involves such information, you may be asked to follow additional measures to safeguard this information.

We also have a duty to protect our Company's physical and financial assets from damage, misuse, theft, fraud, waste or abuse. These assets include our equipment, funds, facilities, vehicles and computers.

If you know of or suspect improper handling of our Company's assets, please report the concern to your manager right away.

### We win the right way when we:

Protect our trade secrets and any other confidential or proprietary information, disclosing only when there is a business need and prior authorization to do so  
Avoid discussing such information in places where we might be overheard, such as restaurants, airplanes, elevators or trains  
Properly secure our computers and other electronic devices, documents or other sensitive materials  
Limit personal use of Company property consistent with the Acceptable Use Policy  
Remember that our obligation to protect our Company's confidential information continues after our employment with MillerCoors ends

## How do I know whether information I'm working with is confidential?

Here are a few questions to ask yourself to help determine whether you're working with confidential information:

- Is this information known outside of MillerCoors?
- Is it proprietary to us or to one of our business partners or suppliers?
- Would MillerCoors or an employee be disadvantaged or harmed if others knew this information?

If you think the answer to any one of these questions is yes, then you should treat the information as confidential. If you're still unsure, then ask your manager for guidance and take the appropriate steps to protect the information. Confidential information should only be used for its intended purpose and not shared with others whose work doesn't require it or those outside the company like family, former employees, friends or neighbors.

## We use technology appropriately

Safeguarding our assets also means using our Company-provided technology appropriately at all times. This includes our computer systems, portable electronic devices, laptops and other technology.

We also take measures to safeguard our systems. That includes blocking offensive, illegal and non-business-related sites. MillerCoors may also review or monitor Company resources, assets and property without users' prior approval, knowledge or consent. This includes monitoring and retrieving information stored or transmitted on MillerCoors devices and systems.

### Social media

We use a variety of social media outlets to connect with consumers and other stakeholders, similar to the way many of us use social media personally. To cultivate our reputation and speak consistently, MillerCoors designates certain individuals to officially represent our Company through social media. We may also positively communicate about our brands and Company within social media, as long as we identify ourselves as employees of MillerCoors. We should also use good judgment and exercise confidentiality when communicating any information about MillerCoors, our people or our business partners. These guidelines also apply to our suppliers, distributors and others who act on our behalf. Please also keep in mind we may not ask family or friends to post content online that we, ourselves, are not allowed to post.

**For additional guidance, refer to our [Acceptable Use Policy and Employee Social Media Guidelines](#).**

### We win the right way when we:

- Consistently follow all security procedures, including never leaving devices where they could be stolen or misplaced
- Keep our usernames and passwords secret, even from co-workers
- Are careful about not allowing others to use our accounts
- Refrain from accessing, downloading or distributing offensive materials or making any disparaging or discriminatory remarks about our Company, colleagues or competitors
- Clearly disclose our affiliation with MillerCoors if we do mention the Company or any of its brands online
- Take care to never share confidential or proprietary information online

**Question:** Is it okay to share my user ID and password with a co-worker?

**Answer:** No, this is not okay and would be a violation of the Code. We must protect our technology and systems at all times. We must not share or allow the use of our user ID outside of MillerCoors and must not share our password with anyone internal or external to the Company or use someone else's password to gain system or file access. Also, we are accountable for all work saved or retrieved, messages sent or received, or transactions carried out under our user ID and password.



***We win the right way when we:***

Maintain complete, honest and accurate records of business transactions and activities  
File records correctly (both paper and electronic), transfer them to storage when appropriate and review them regularly to identify those due for disposal in accordance with our Records Retention Policy  
Treat email as written communication (not oral), remembering that these messages are permanent and retrievable  
Comply fully and immediately with any legal requirement (and other information sources) because of litigation or a regulatory investigation

**"All of us are responsible for the integrity of our records and information."**

**Question:** I heard that a local MillerCoors vendor had submitted known, false and inflated invoices to MillerCoors for reimbursement. If this is true, then the vendor's actions are clearly wrong. But, because I'm not certain that this is true, then there's no need for me to get involved, right?

**Answer:** You have a responsibility to speak up about any known or suspected violations of the Code or law. This extends to the conduct of our business partners, as well. If true, the vendor's misconduct affects us all, as the fraudulent invoices increase our costs and also have the potential to tarnish MillerCoors reputation. We expect our business partners to meet our high ethical standards. You should report the information in good faith to your manager or any of the other resources listed in the "Speaking up is the right way" section of this Code.

**We respond to inquiries and requests appropriately**

MillerCoors recognizes the need to develop and deliver strategic, coordinated messages to employees, the public, media, distributors, suppliers, and state and local governments. And occasionally, a government auditor or government official might request our participation in an investigation of MillerCoors or its employees.

***For additional guidance, refer to our [Communications Procedural Guidelines](#) and our [News Media Procedural Guideline](#).***

***We win the right way when we:***

- Ensure all internal and external messages are aligned with MillerCoors communications strategy and accurately depict our business activities and plans
- Only allow designated Company spokespersons to make public statements on our Company's behalf
- Always involve the Legal and Communications Departments when cooperating with investigations and audits or responding to requests for information from investors, analysts or members of the media
- Are forthright in our representations and accurately depict our business activities and plans – at no time may we conceal, alter or destroy any requested records
- Stay clear of attempting to exert improper influence on the results of an investigation or audit

**Question:** I was invited to represent MillerCoors as a guest speaker at a professional conference. Can I accept the invitation?

**Answer:** MillerCoors employees are often asked to present as guest speakers at professional conferences and events. Public speaking opportunities can help to build MillerCoors reputation, attract top talent, and enhance employee presentation skills and expertise. Public speaking requests must be approved by the Communications Department prior to accepting.

***We win the right way when we:***

Avoid buying or selling the securities  
of a company if we are aware of inside  
information about that company  
Refuse to pass along inside information to  
others so they may buy or sell securities  
Remember that the above actions could be  
considered "insider trading," which is illegal





# WINNING WITH OUR SOCIETY AND SOURCES

**W**e are quality people committed to brewing great beer, and we have a deep sense of responsibility to the environment, communities and our beer drinkers.

## We support responsible consumption

Embracing responsibility is a fundamental part of creating America's best beer company. While millions of adults enjoy our products every day, we engage consumers and stakeholders and work collectively with them to promote responsible enjoyment of our products.

With great beer comes great responsibility, and this responsibility begins with us. [Our Employee Alcohol Policy](#) demonstrates our commitment to and expectations for responsible consumption. Our "Alcohol Behavior and Communication" training program reminds us of the positive role we have as ambassadors of responsibility.

*For additional guidance, refer to our [Employee Alcohol Policy](#) and [Great Beer Great Responsibility website](#).*

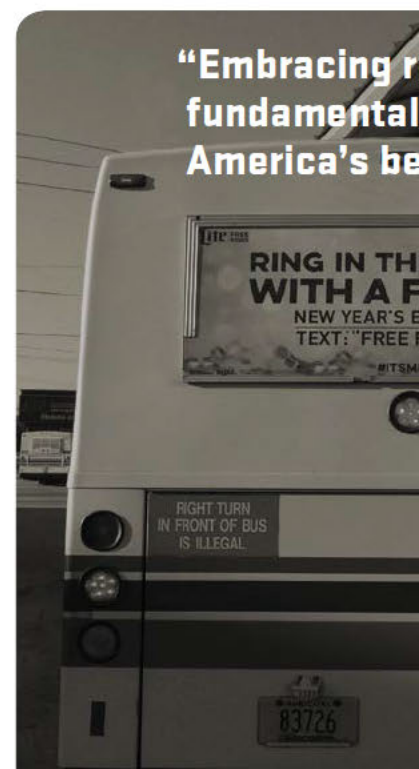
### *We win the right way when we:*

- Play a positive role as ambassadors of alcohol responsibility, behaving in a way that enhances MillerCoors reputation and shows a responsible attitude toward drinking
- Obey all alcohol-related laws and never put ourselves or others at risk
- Ensure our performance at work is not impaired by alcohol
- Seek medical help or counseling if dealing with an alcohol-related problem

**Question:** What happens if I get pulled over?

**Answer:** That depends. Our Employee Alcohol Policy outlines which employees are required to report DUI/DWI to their HR manager within two business days. Factors, including the employee's blood alcohol content, allowance, the offense was work-related or not, and death. To learn more about reporting requirements, you still have questions, contact your HR manager.

**"Embracing responsibility is a fundamental part of creating America's best beer company."**





### ***We win the right way when we:***

Demonstrate a commitment to our environmental sustainability goals and objectives  
Share best practices across our Company with an aim to improve our environmental performance  
Participate in beverage industry and sustainability forums and provide thought leadership on environmental issues of greatest impact to our business  
Encourage our fellow team members to be active in local environmental activities

**“We are committed to the communities where we work, live and sell beer.”**



## **We invest in communities**

MillerCoors enjoys a rich history in contributing to its communities. Today, we continue this commitment by focusing our investments and partnerships with organizations that promote responsible consumption, water stewardship and education, training and workforce readiness programs. In addition to financial contributions and in-kind donations, MillerCoors actively supports our volunteer efforts to make a difference in our communities.

We understand that many of us will also want to participate in our communities through involvement in local or national politics. Remember, though, that our participation in political campaigns or events must be on our own time and at our own expense. It's never permissible to use Company time or resources (including email systems and office supplies) for political causes or campaigns. We are also prohibited from pressuring or attempting to influence a fellow employee's participation in any political event or cause.

Our Company engages in the political process to the extent that it's beneficial for our business and consistent with applicable law. Our Company will only contribute to political candidates or campaigns with the prior approval of our Government Affairs Department. Please contact the Government Affairs Department if you need further guidance about acceptable activities.

***For further information, refer to our [Community Investment](#) page on our [Great Beer Great Responsibility](#) website.***

### ***We win the right way when we:***

- Support MillerCoors commitment to the communities where we work, live and sell beer
- Follow the proper approval process for making community investments
- Respect Company time and resources by not using these for political causes or campaigns

## **We embrace ethics and transparency**

Our vision to create America's best beer company is based on the quality of our people and our beer, and not because of any unfair or unethical tactics. All of us are responsible for complying with the anti-corruption and bribery laws that apply to our work, such as the Foreign Corrupt Practices Act ("FCPA") and the UK Bribery Act. Such laws prohibit:

- Paying, offering, accepting or receiving a bribe in any form:
  - In both the public and private sectors
  - In any country

A "bribe" is anything of value (such as a payment, gift, favor or entertainment) meant to obtain influence, business or some other improper advantage. Keep in mind that we may not retain a third party to make prohibited payments on our behalf, and we may be held responsible for the acts of the third parties we do retain. For this reason, we must be careful when selecting third parties, such as agents and consultants.

If you're considering providing anything of value to our consumers, retailers, distributors or suppliers, but you aren't sure if it's proper – or if you have any concerns about a supplier's unethical business practices – check with the Legal Department. You should report any suspected bribery by suppliers to the Legal Department or the Business Integrity team.

If you're offering anything of value to government officials – or their staffs or families – you will need the prior written approval of the Chief Public Affairs and Communications Officer.

Transparency is also an important part of acting ethically and complying with anti-corruption laws. All expenses incurred by the Company must be accurately recorded; you must

never operate an unrecorded ("slush") fund for any purpose or make any false or misleading entries in the Company's books or financial records.

### ***We win the right way when we:***

- Understand that a "bribe" can be anything of value (such as a payment, gift, favor or entertainment) meant to influence the intended recipient or obtain business or some other improper advantage
- Refuse to pay, offer, accept or receive a bribe in any form
- Raise any questions or concerns about suspected bribery or a supplier's unethical business practices

**Question:** We are currently reviewing vendor proposals for a heating and cooling project at the brewery. One of the vendors called to see whether I had any questions about their proposal. During this call, the vendor stated that if his company's proposal is selected, then it would be very easy to also install a new heating and cooling system at my house. I thought he was kidding, but then the vendor reiterated the offer at the end of the call. What should I do?

**Answer:** We are responsible for following laws that prohibit paying, offering, accepting or receiving a bribe. A bribe can be anything of value, such as a payment, gift, favor or entertainment meant to influence or obtain business. We expect our business partners to meet our high ethical standards. You should report any suspected bribery by vendors or suppliers to the Legal Department or Business Integrity team.



**O**ur primary focus is on our consumers, retailers and distributors because they are at the heart of everything we do. Whether we interact directly with them or support those who do, our actions are geared toward them. We work every day to amaze them with high-quality products and services that build our brands and drive revenue.

### We compete fairly

These commitments drive us to compete aggressively for business and sales opportunities. However, it's just as important that we compete lawfully and with integrity. Antitrust laws and trade practice regulations control how we can compete in the marketplace, and it's important that we follow them.

#### ***Antitrust***

Antitrust laws aim to stop unfair business practices that restrict competition, ensuring that consumers have an opportunity to buy high-quality goods and services at fair market prices. Some typical examples of improper scenarios include:

- Price-fixing, in which competitors (or distributors and retailers) agree on the prices they will offer in order to manipulate the market
- Agreeing with a competitor to divide retailers or territories
- Agreeing with a competitor to boycott – or refuse to do business with – any third party

Note that even the appearance or threat of antitrust violations can create problems. When these cases arise, seek guidance from the Legal Department before taking further action. Violations of these laws and regulations can carry penalties for both the individuals involved and MillerCoors.

#### ***Trade practice***

Trade practice regulations generally prohibit any MillerCoors employees from providing anything of value to our retailers as an inducement to sell our products, but there are also exceptions for permitted trade practice activities. These regulations, which vary by state, are often confusing as we try to apply them to real situations in our daily work. Even though they may sometimes be unclear, we will compete aggressively while always complying with these regulations.

When unclear situations arise, or if you have any questions, please seek guidance from the Legal Department before taking further action. Violations of these laws and regulations can carry penalties for both the individuals involved and MillerCoors. Our license to sell beer in the state can also be suspended or revoked.

***For additional guidance, refer to our [Antitrust Policies and Guidelines](#).***



## **We protect others' data**

Just as we take care to guard our own confidential and proprietary information, we also act as responsible stewards of the data others have entrusted to us. Our retailers, distributors, suppliers, contractors, consultants and other business partners expect this from us, and our brand and integrity demands it. Be sure to protect these types of third-party information with the same care you apply to our own sensitive company information.

Also, while staying up to speed with our competitors' efforts helps us fine-tune our own strategies, we will not gather this information unethically or illegally. Respecting competitor information means we never request it from new hires who previously worked for a MillerCoors competitor. Requesting or accepting confidential information of another company without its consent is prohibited.

If you have questions or receive competitor information that could be confidential or obtained by inappropriate means, contact the Legal Department immediately.

## **We win the right way when we:**

Refrain from disclosing our partners' confidential information without prior authorization (both while we are employed at MillerCoors and after our employment ends)  
Always respect trademarks and copyrighted material, including information in software and public websites  
Carefully adhere to all applicable license terms when using intellectual property owned by someone other than MillerCoors







**W**e have great people dedicated to a heritage of brewing the highest quality beer and committed to building our great beer brands the right way.

### **We sell and market responsibly**

We have a passion for beer and our brands that drives us to understand our industry, our consumers and our competitors. We appreciate the challenges in our industry and understand the role our brands play in society. MillerCoors approach to responsibly advertising and marketing our products involves active participation in the Beer Institute and complying with our own internal standards (described in the [Marketing Compliance Manual](#)), which exceed the requirements of federal laws and standards set by our industry and the broadcast media.

#### ***We win the right way when we:***

- Ensure all advertising complies with MillerCoors high internal standards as outlined in the Marketing Compliance Manual
- Promote self-regulation, including through active participation in the Beer Institute
- Refrain from making disparaging remarks about our competitors

### **We ensure product quality**

Our vision to create America's best beer company starts with great beer. We are committed to providing products of superb quality, flavor and value to our consumers. Our passion to produce the most refreshing and satisfying brand portfolio drives us to select raw ingredients and packaging materials – and ultimately create great products – that are safe, comply with applicable laws and regulations, and consistently exemplify our high standards.

Suppliers and distributors also play a critical role in sustaining the trust of our consumers. If you know or suspect that a supplier or distributor may not be respecting our shared commitment to quality and safety, please report your concern to your immediate manager first, followed by the manager of Supplier Quality, Corporate Quality Assurance.

#### ***We win the right way when we:***

- Take all the necessary steps to deliver quality and safe products
- Drive quality excellence throughout our supply chain
- Report any concerns about product safety right away



**Question:** I'd like to collect consumer data at our on-premise promotion this weekend or engage our promotion agency to gather the information. Is this okay?

**Answer:** Yes, but you must follow specific internal guidelines created to comply with legal requirements when collecting data, storing it and loading it into the MillerCoors Consumer Database. If you use a promotion agency, you must ensure that the appropriate contractual agreement is in place before the data is collected. If you have any questions, you should contact the MillerCoors Digital Team or the Legal Department.



## Waivers

Waivers of (or amendments to) any portion of this Code are granted only in rare circumstances and after careful deliberation. If you have an exception (or a situation or instance that does not conform) to any section of the Code and believe that a waiver should be considered, contact your immediate manager. If your immediate manager agrees that you may have an exception to be considered for a waiver, he or she should contact Business Integrity. Waivers granted to any Senior Leader or direct report of the Senior Leadership Team will be granted only by the Board of Directors or the Audit Committee of the Board.







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Chicago, IL 60606

**BUSINESS  
INTEGRITY**  
WINNING THE RIGHT WAY

## ACKNOWLEDGMENT

I participated in the 2016 MillerCoors Code of Business Conduct training session. I understand that MillerCoors employees are responsible for complying with the Code.

Should I have an exception to the Code, I must disclose it. An exception is anything that may conflict with (or be contrary to) the provisions of the Code (e.g., a second job with a MillerCoors retailer or competitor; a family member with an ownership interest in a company that is a MillerCoors supplier; work with/supervision by a close family member). All exceptions are reviewed to determine if there is a conflict with the Code and if so, the appropriate steps to be taken to mitigate the conflict or potential conflict.

To the best of my knowledge, I have no current exceptions to the Code that must be disclosed.

If I have an exception to disclose at this time, I will report it now by checking the box, "I have an exception," and writing it below.

If, after affirming the Code I realize I have an exception, I will immediately contact the Senior Director Business Integrity and Manager Business Integrity at [businessintegrity@millercoors.com](mailto:businessintegrity@millercoors.com).

☐ I have an exception:

Signed: (b) (6), (b) (7)(C) Date: (b) (6), (b) (7)(C) 1/16  
Print Name: (b) (6), (b) (7)(C)  
Position: (b) (6), (b) (7)(C)



**BUSINESS**

WINNING THE RIGHT WAY



# BAD THINGS

— *always come in* —

# THREES.

**TRUE OR FALSE**

**FALSE.**

When going through a rough patch, it can be tough to see the good things.

Life can throw a lot at you, from small worries to big concerns. If you find yourself focusing too much on relationship, work or other issues, your EAP benefit offers confidential help and support to help you take control.

A specialist will listen to your needs and connect you to the appropriate resources. Clinicians, counselors, mediators, lawyers and financial advisors are ready to help you with:

- Stress, anxiety and depression
- Marriage and parenting issues
- Workplace conflicts
- Sleeping problems
- Financial or legal questions
- Substance abuse or other addictions



As part of your benefits, EAP services are available at no extra cost. This includes referrals, seeing in-network clinicians and initial consultations with mediators or financial and legal experts

Want to retain a lawyer after your consultation? You'll get a 25 percent discount.

Access to [liveandworkwell.com](https://liveandworkwell.com) is always free. For more information, please refer to your employer-provided benefit information.

**24-hour online access is also available at [liveandworkwell.com](https://liveandworkwell.com).**

You and your family can also go online any time to:

- Check benefit information
- Submit online service requests
- Search the online clinician directory
- Use our virtual help centers to find information and resources for hundreds of everyday work and life issues
- Participate in interactive, customizable self-improvement programs

All records are kept confidential in accordance with federal and state laws.

**Find a better balance between your work life and your home life — so you can enjoy life.**

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**Real people. Real life. Real solutions.**

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**(877) 468-1009**

Or log on to [liveandworkwell.com](https://liveandworkwell.com)  
Access code: millercoors

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**This program should not be used for emergency or urgent care needs. In an emergency, call 911 or go to the nearest emergency room.** This program is not a substitute for a doctor's or professional's care. This program and its components may not be available in all states and coverage exclusions may apply.

# PERFORMANCE/ATTENDANCE CORRECTIVE ACTION AGREEMENT

CI-4498

DATE (b) (6), (b) (7)(C) / /

(b) (6), (b) (7)(C)

SOCIAL SECURITY NO.

(b) (6), (b) (7)(C)

MANAGER

(b) (6), (b) (7)(C)

DEPARTMENT

SHIFT

PRESENT AT INTERVIEW

DISTRIBUTION

SILVER

(b) (6), (b) (7)(C)

HISTORY:

(b) (6), (b) (7)(C)

VIOLATED THE MILLER COORS ATTENDANCE POLICY FOR  
NUMBER OF HOURS IN A 6 MONTH PERIOD WHICH IS MORE THAN 48 HRS.

02/24/11 - 8

(THIS IS THE SHENANDOAH POLICY)

03/18/11 - 12

03/19/11 - 12

05/04/11 12

05/05/11 12

TOTAL OF 56 HRS.

EMPLOYEE AGREEMENTS:

OK WITH EVERYTHING

MANAGER AGREEMENTS:

Will keep (b) (6), (b) (7)(C) INFORMED OF ATTENDANCE BUT IT IS THE  
RESPONSIBILITY OF (b) (6), (b) (7)(C) TO IMPROVE ON ATTENDANCE

I am familiar with the Workrules  
and Corrective Discipline Policy as stated in the  
Employee Handbook.

☒ YES

☐ NO \*

I am familiar with Conflict Resolution  
Process and Procedure.

☒ YES

☐ NO \*

- ☒ First Written Agreement
- ☐ Final Written Agreement
- ☐ Discharge
- ☐ Disciplinary Suspension
- ☐ Performance Probation
- ☐ Other

\* ☒ Explained Work Rules and corrective Discipline Policy

\* ☒ Explained Conflict Resolution Process and Procedures.

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

FOR HUMAN RESOURCES DEPARTMENT USE ONLY

H.R. REPRESENTATIVE

DATE

DISTRIBUTION: WHITE - Human Resources; CANARY - Supervisor; PINK - Employee



Coors Brewing Company  
Golden, Colorado

## LOAD ERROR ADJUSTMENT (LEAF)

C-3557

4-12

ORIGINAL ORDER NUMBER: <u>10055887</u>		LOAD TYPE: <input type="checkbox"/> BEER	
(SALES ORDER #): DATE:		INSTRUCTIONS	
COORS BREWING COMPANY PO BOX 4030 GOLDEN, CO 80401 FAX NUMBER: 303-377-6739 <u>877-293-7792</u>		PLEASE PROVIDE THE FOLLOWING DOCUMENTATION ALONG WITH THE COMPLETED LEAF FORM: • COPY OF BILL OF LADING • COPY OF COORS INVOICE • LOADING DIAGRAM	
DISTRIBUTOR NUMBER: (b) (4)		BOL DELIVERY # <u>81468803</u>	
(b) (4) (b) (4)		CITY AND STATE: <u>Indianapolis, IN 46236</u>	
MATERIAL NUMBER	DESCRIPTION OF PRODUCT	QUANTITY INVOICED	QUANTITY SHIPPED
319466	KL Bag Toss 30-12oz 3pk Can Pl	1716	1638
(b) (6), (b) (7)(C)		DISCREPANCY (+ OR -) -78	
WAREHOUSE USE ONLY			
LEAF APPROVED:		SIGNATURE:	
LEAF REJECTED:		DATE:	
EXPLANATION AND APPROVAL:		WHOUSE NAME:	
		WHOUSE LOCATION:	
		SIGNATURE:	
BILLING DEPARTMENT USE ONLY			
INVOICE DATE:		DEBIT:	
SERIAL #		CREDIT:	
DATE		DATE	
%		%	
ZCP, EDP DOC NO		CREATE DATE	
DOLEAF VALUE		POSTED DATE	
		POSTED BY:	
BARCODE			





# Stock Transport Order Discrepancy Form

4-16

Date : 4/19/11		Instructions			
Coors Brewing Company Tax Department Fax Number: 1-877-293-7792		Please provide the following documentation along with this form: • Copy of Bill of Lading			
SRC Number 350	Ship from Plant # 30	BOL (Delivery) # 81469610	Shipment Date 4/16/11		
Material Number	Pallet ID (Barcode #)	Description of Product	Quantity on BOL	Quantity Shipped	Discrepancy (+ or -)
27964	1758860588	CLC-1230 PR Coors Light	0	78	+ 78
27964	1758860595	CLC-1230 PR Coors Light	0	78	+ 78
Requestors Name and Phone Number : (b) (6), (b) (7)(C) EXT (b) (6), (b) (7)(C)					
Warehouse Use Only					
Approved _____	Correction Made Yes _____ NO _____		Warehouse Name		
Refused _____	Date _____		Warehouse Location		
Explanation and Approval ( credit explanation need to be as complete as possible for TTB)					
Signature _____					
Tax Department Use Only					
Invoice Date		Debit		Credit	
Serial #	Date	Days _____ %		Days _____ %	

# PERFORMANCE/ATTENDANCE CORRECTIVE ACTION AGREEMENT

CI-4498

DATE: (b) (6), (b) (7)(C)

09

EMPLOYEE: (b) (6), (b) (7)(C)	SOCIAL SECURITY NO.	MANAGER: (b) (6), (b) (7)(C)
DEPARTMENT: Distribution	SHIFT: Silver/Days	REPORT AS INTERVIEW: (b) (6), (b) (7)(C)

HISTORY: (b) (6), (b) (7)(C) is being given a first written agreement for violation of work rules and corrective discipline shenandoah policy. (b) (6), (b) (7)(C) has missed 3 absences in a 3 month period; 03/04/09, 04/09/09, and 05/07/09, 05/08/09. More than 48 hours in 6 months period; 6.5 hrs-01/12/09, 12 hrs-03/04/09, 04/09/09, 05/07/09, and 05/08/09. 6 absences in 12 month period; 05/09/08, 08/09/08, 08/10/08, 10/24/08, 12/14/08, 03/04/09, 04/09/09, 05/08/09 and 05/09/09.

EMPLOYEE AGREEMENTS:

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MANAGER AGREEMENTS: I will keep (b) (6), (b) (7)(C) informed of (b) (6), (b) (7)(C) attendance status when it gets close to being a violation issue. I have also explained the attendance guidelines that (b) (6), (b) (7)(C) will now be held to.

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<p>I am familiar with the Workrules and Corrective Discipline Policy as stated in the Employee Handbook.</p> <p><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO *</p>	<p>I am familiar with Conflict Resolution Process and Procedure.</p> <p><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO *</p>	<p><input checked="" type="checkbox"/> First Written Agreement</p> <p><input type="checkbox"/> Final Written Agreement</p> <p><input type="checkbox"/> Discharge</p> <p><input type="checkbox"/> Disciplinary Suspension</p> <p><input type="checkbox"/> Performance Probation</p> <p><input type="checkbox"/> Other</p>
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\* ☒ Explained Work Rules and corrective Discipline Policy (b) (6), (b) (7)(C)

\* ☒ Explained Conflict Resolution Process and Procedures. (b) (6), (b) (7)(C)

FOR HUMAN RESOURCES DEPARTMENT USE ONLY

H.R. REPRESENTATIVE	DATE
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DISTRIBUTION: WHITE - Human Resources; CANARY - Supervisor; PINK - Employee

# PERFORMANCE/ATTENDANCE CORRECTIVE ACTION AGREEMENT

CI-4498

DATE: (b) (6), (b) (7)(C) 105

EMPID (b) (6), (b) (7)(C)	SOCIAL SECURITY NO. (b) (6), (b) (7)(C)	MANAGER (b) (6), (b) (7)(C)
DEPARTMENT WAREHOUSE	SHIFT SILVER	PRESENT AT INTERVIEW (b) (6), (b) (7)(C)

HISTORY: Violation of attendance policy for 3 absences in a 3-month period: Oct. 9 + 10, of 2004, Oct. 24 + 25 of 2004, and Jan. 7, 2004. (SEE ATTACHMENTS OF ATTENDANCE RECORD).

EMPLOYEE AGREEMENTS: (b) (6), (b) (7)(C) WILL BE AT WORK WHEN SCHEDULED OR USE APPROPRIATE BENEFITS WHEN ABSENT FROM WORK. FURTHER ABSENCES AS OUTLINED BY THE ATTENDANCE WILL RESULT IN A FINAL WRITTEN WARNING.

MANAGER AGREEMENTS: (b) (6), (b) (7)(C) WILL BE INFORMED OF HIS ATTENDANCE STATUS ON A REGULAR BASIS AND ACCORDINGLY PER ANY FUTURE ABSENCES

I am familiar with the Workrules and Corrective Discipline Policy as stated in the Employee Handbook.

☒ YES

☐ NO \*

I am familiar with Conflict Resolution Process and Procedure.

☐ YES

☒ NO \*

- ☒ First Written Agreement
- ☐ Final Written Agreement
- ☐ Discharge
- ☐ Disciplinary Suspension
- ☐ Performance Probation
- ☐ Other

\* ☒ Explained Conflict Resolution Process and Procedures.

(b) (6), (b) (7)(C)

## FOR HUMAN RESOURCES DEPARTMENT USE ONLY

H.R. REPRESENTATIVE

(b) (6), (b) (7)(C)

DATE

(b) (6), (b) (7)(C) 105

DISTRIBUTION: WHITE - Human Resources; CANARY - Supervisor; PINK - Employee

(b) (6), (b) (7)(C) 105



(b) (6), (b) (7)(C)

**From:** (b) (6), (b) (7)(C)  
**Sent:** Wednesday, July 05, 2017 7:14 AM  
**To:** (b) (6), (b) (7)(C)  
**Subject:** FW: (b) (6), (b) (7)(C)

(b) (6), (b) (7)(C),  
Please pull the history on coachings and formal discipline on (b) (6), (b) (7)(C) and let's review with (b) (6), (b) (7)(C). (b) (6), (b) (7)(C) has received a few coachings and still continues to have performance issues. Thanks.

(b) (6), (b) (7)(C)

**From:** (b) (6), (b) (7)(C)  
**Sent:** Wednesday, July 05, 2017 5:02 AM  
**To:** (b) (6), (b) (7)(C)  
**Cc:** (b) (6), (b) (7)(C)  
**Subject:** (b) (6), (b) (7)(C)

During our inventory cycle count last night, (b) (6), (b) (7)(C) found a discrepancy at bin 3212. (b) (6), (b) (7)(C) physically counted 18 but the system showed 20. (b) (6), (b) (7)(C) printed out a list of HUs and found the 2 HUs that showed missing in 3212 deep into bin 3310. Below you can see that product was being floored in bins 3212 and 3310 at the same time so (b) (6), (b) (7)(C) carelessly confirmed product in the wrong bin. The highlighted rows are (b) (6), (b) (7)(C) two missing pallets that were found.

What kind of trend does (b) (6), (b) (7)(C) have for quality?? I sat in on the coaching (b) (6), (b) (7)(C) had with (b) (6), (b) (7)(C) last week about confirming pallets under the wrong process order while pulling the lines.

Thanks,

(b) (6), (b) (7)(C)

Warehouse Task										
Whse Task	ProcessCat.Desc	Status	Product	Product Short Description	Created By	Dest.HU	Source Bin	Dest.Bin	Created On	Cr
9365402	Putaway	C	42029	KEYL2/1512OZATCN-CARTRL4-D0	(b) (6), (b) (7)(C)	1730970427	GR-PL02	PL02	07/02/2017	10
100002841322	Goods Receipt Posting	C	42029	KEYL2/1512OZATCN-CARTRL4-D0		1730970427		GR-PL02		10
9365404	Putaway	C	42029	KEYL2/1512OZATCN-CARTRL4-D0		1730970427	PL02	3212		10

Warehouse Task										
Whse Task	ProcessCat.Desc	Status	Product	Product Short Description	Created By	Dest.HU	Source Bin	Dest.Bin	Created On	Cr
9365401	Putaway	C	42029	KEYL2/1512OZATCN-CARTRL4-D0	(b) (6), (b) (7)(C)	1730970410	GR-PL02	PL02	07/02/2017	10
100002841322	Goods Receipt Posting	C	42029	KEYL2/1512OZATCN-CARTRL4-D0		1730970410		GR-PL02		10
9365403	Putaway	C	42029	KEYL2/1512OZATCN-CARTRL4-D0		1730970410	PL02	3212		10

3212	1730970373	42029	KEYL2/1512OZATCN-CARTRL4-D0	78 CAS	2U	Un
3212	1730970380	42029	KEYL2/1512OZATCN-CARTRL4-D0	78 CAS	2U	Un
3310	1730970397	42029	KEYL2/1512OZATCN-CARTRL4-D0	78 CAS	2U	Un
3310	1730970403	42029	KEYL2/1512OZATCN-CARTRL4-D0	78 CAS	2U	Un
3212	1730970410	42029	KEYL2/1512OZATCN-CARTRL4-D0	78 CAS	2U	Un
3212	1730970427	42029	KEYL2/1512OZATCN-CARTRL4-D0	78 CAS	2U	Un
3212	1730970434	42029	KEYL2/1512OZATCN-CARTRL4-D0	78 CAS	2U	Un
3212	1730970441	42029	KEYL2/1512OZATCN-CARTRL4-D0	78 CAS	2U	Un
3212	1730970458	42029	KEYL2/1512OZATCN-CARTRL4-D0	78 CAS	2U	Un
3212	1730970465	42029	KEYL2/1512OZATCN-CARTRL4-D0	78 CAS	2U	Un
3212	1730970472	42029	KEYL2/1512OZATCN-CARTRL4-D0	78 CAS	2U	Un
3212	1730970489	42029	KEYL2/1512OZATCN-CARTRL4-D0	78 CAS	2U	Un
3212	1730970496	42029	KEYL2/1512OZATCN-CARTRL4-D0	78 CAS	2U	Un
3212	1730970502	42029	KEYL2/1512OZATCN-CARTRL4-D0	78 CAS	2U	Un
3212	1730970519	42029	KEYL2/1512OZATCN-CARTRL4-D0	78 CAS	2U	Un
3212	1730970526	42029	KEYL2/1512OZATCN-CARTRL4-D0	78 CAS	2U	Un
3212	1730970533	42029	KEYL2/1512OZATCN-CARTRL4-D0	78 CAS	2U	Un
3212	1730970540	42029	KEYL2/1512OZATCN-CARTRL4-D0	78 CAS	2U	Un
	1730970557	42029	KEYL2/1512OZATCN-CARTRL4-D0	78 CAS	2U	Un
3212	1730970564	42029	KEYL2/1512OZATCN-CARTRL4-D0	78 CAS	2U	Un
3212	1730970571	42029	KEYL2/1512OZATCN-CARTRL4-D0	78 CAS	2U	Un
3212	1730970588	42029	KEYL2/1512OZATCN-CARTRL4-D0	78 CAS	2U	Un
3212	1730970595	42029	KEYL2/1512OZATCN-CARTRL4-D0	78 CAS	2U	Un
3310	1730970601	42029	KEYL2/1512OZATCN-CARTRL4-D0	78 CAS	2U	Un
3310	1730970618	42029	KEYL2/1512OZATCN-CARTRL4-D0	78 CAS	2U	Un
3310	1730970625	42029	KEYL2/1512OZATCN-CARTRL4-D0	78 CAS	2U	Un
3310	1730970632	42029	KEYL2/1512OZATCN-CARTRL4-D0	78 CAS	2U	Un
3310	1730970649	42029	KEYL2/1512OZATCN-CARTRL4-D0	78 CAS	2U	Un
3310	1730970656	42029	KEYL2/1512OZATCN-CARTRL4-D0	78 CAS	2U	Un
3310	1730970663	42029	KEYL2/1512OZATCN-CARTRL4-D0	78 CAS	2U	Un
3310	1730970670	42029	KEYL2/1512OZATCN-CARTRL4-D0	78 CAS	2U	Un
3310	1730970687	42029	KEYL2/1512OZATCN-CARTRL4-D0	78 CAS	2U	Un
3310	1730970694	42029	KEYL2/1512OZATCN-CARTRL4-D0	78 CAS	2U	Un
3310	1730970700	42029	KEYL2/1512OZATCN-CARTRL4-D0	78 CAS	2U	Un

(b) (6), (b) (7)(C)

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**Subject:** FW: Coaching's

**From:** (b) (6), (b) (7)(C)  
**Sent:** Saturday, (b) (6), (b) (7)(C), 2017 7:20 PM  
**To:** (b) (6), (b) (7)(C)  
**Cc:** (b) (6), (b) (7)(C)  
**Subject:** Coaching's

Please add to log

(b) (6), (b) (7)(C)

With below conversation

Today we had a conversation about ensuring the pallets that you are picking up on your forks are correct with what is in the system. You picked up pallets that we different product than the description on the screen. going forward please ensure that all pallets that are picked are physically and systematically correct. This includes but not limited to product code, description, quantity, etc....Any further instances of similar in nature will result if disciplinary action.

Thanks

(b) (6), (b) (7)(C)



(b) (6), (b) (7)(C)

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**From:** (b) (6), (b) (7)(C)  
**Sent:** Saturday, (b) (6), (b) (7)(C) 2017 4:39 AM  
**To:** (b) (6), (b) (7)(C)  
**Cc:** (b) (6), (b) (7)(C)  
**Subject:** Coaching's

(b) (6), (b) (7)(C) please add for (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C)

Today we had a conversation about the process order that was ran incorrectly. We must be diligent in ensuring that our product is correct that we are running. We discussed that we needed to perform the verifications as written in the work instructions. We also discussed how crucial it is that we verify at the 1<sup>st</sup> pallet to ensure that it was created correctly. I informed you that any similar issues would result in discipline regardless of amount of cases or circumstances.

Thanks

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

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**From:**  
**Sent:**  
**To:**  
**Subject:**

[Please add to the log](#)

[Thanks](#)

(b) (6), (b) (7)(C)

**From:** (b) (6), (b) (7)(C)  
**Sent:** Thursday, (b) (6), (b) (7)(C) 2017 11:24 AM  
**To:** (b) (6), (b) (7)(C)  
**Subject:** Coaching

(b) (6), (b) (7)(C)

This is a follow up from (b) (6), (b) (7)(C)/17 where we discussed wearing your seat belt. I was walking towards PL01 where I noticed you were unloading pallets and putting them away and noticed you were not wearing your seat belt. This is the second instance this year that I have had to remind you about wearing your seat belt while operating a fork lift. Please understand going forward that failure to wear your seat belt when on a fork lift is subject to disciplinary action.

Thanks

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

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**From:** (b) (6), (b) (7)(C)  
**Sent:** Wednesday, (b) (6), (b) (7)(C) 2017 8:10 AM  
**To:** (b) (6), (b) (7)(C)  
**Cc:** (b) (6), (b) (7)(C)  
**Subject:** FW: coaching

(b) (6), (b) (7)(C) please add to log.

Thanks

(b) (6), (b) (7)(C)

**From:** (b) (6), (b) (7)(C)  
**Sent:** Wednesday, (b) (6), (b) (7)(C), 2017 8:09 AM  
**To:** (b) (6), (b) (7)(C)  
**Subject:** coaching

(b) (6), (b) (7)(C) today we discussed the expectation that you arrive to the team meeting on time. Today you were late to the team meeting. You indicated it was not real late just a few seconds. You were a minute or two late. I explained that it was a metric that we track if everyone was on time to meeting and explained that late is late. You understood and expressed that you would be on time from now on.

Thanks

(b) (6), (b) (7)(C)



DATE: (b) (6), (b) (7)(C), 2016

EMPLOYEE NAME (b) (6), (b) (7)(C)	HIRE DATE	SUPERVISOR NAME (b) (6), (b) (7)(C)	<input checked="" type="checkbox"/> FIRST WRITTEN WARNING
DEPARTMENT WAREHOUSE	SHIFT SILVER	OTHERS PRESENT AT INTERVIEW	<input type="checkbox"/> FINAL WRITTEN WARNING
SUPERVISOR'S STATEMENT (NATURE OF PROBLEM, TIME, DATE, PLACE, ETC.)  (b) (6), (b) (7)(C) you are receiving a written warning in response to your resistance to follow a work directive. In particular, leading the L1 structured communication meeting and following the prescribed format. On several occasions we have discussed facilitation of the pre-shift meetings and your failure to follow the prescribed format. The first conversation occurred the week of (b) (6), (b) (7)(C) with me, the second was a conversation you had with (b) (6), (b) (7)(C) on (b) (6), (b) (7)(C) and the third was today following pre-shift. We offered to provide additional training and support to you to ensure you were comfortable with the directive. You indicated you did not need assistance and furthermore you understood the directive but refused to follow it. This is a violation of the Shenandoah Supplemental Policy Guide. In particular, the Work Rules and Corrective Discipline guideline that indicates <i>The following are examples of situations subject to disciplinary actions, up to and including discharge. Job performance problems such as errors, lack of skills to perform job functions, not meeting set objectives, not following procedures...</i> This is a performance issues with not meeting set objectives and following procedures. To be clear, it is expected that moving forward you facilitate the L1 structured communication meeting and follow the required format. Failure to do so will result in additional discipline, up to and including termination.			<input type="checkbox"/> DISCHARGE
			<input type="checkbox"/> FINAL WARNING & SUSPENSION

I am familiar with the provisions of  
Policy Work Rules & Corrective Discipline

☐ Yes  
☐ No

I am familiar with the complaints and appeals  
procedures of policy Supplemental Conflict  
Resolution – The “Resolve” Program

☐ Yes  
☐ No

**NOTE:** Paygroup 20 & 21 employees (not including administrative employees) have seven (7) calendar days to request mediation and/or an appeal of this disciplinary action.

EMPLOYEE'S STATEMENT I AM BEING SINGLED-OUT NO OTHER EMPLOYEE IN THE BREWERY IS BEING WRITTEN UP FOR NOT PARTICIPATING. THERE ARE NO SPECIFIC GUIDELINES FOR FACILITATING THE MEETING OR REQUIREMENT TO READ.	
EMPLOYEE'S SIGNATURE & DATE (b) (6), (b) (7)(C) 2016	<b>NOTE:</b> SIGNATURE ACKNOWLEDGES RECEIPT, IT DOES NOT INDICATE AGREEMENT

<input type="checkbox"/> EXPLAINED WORK RULES AND CORRECTIVE DISCIPLINE AND SUPPLEMENTAL POLICY CONFLICT RESOLUTION – THE “RESOLVE” PROGRAM	SUPERVISOR’S SIGNATURE & DATE (b) (6), (b) (7)(C) /2016
<b>FOR HUMAN RESOURCES USE ONLY:</b>	
HR / ER	DATE

**DISCIPLINARY WARNING REPORT**  
Addendum

## Mediation

Employees wishing to mediate disciplinary action must request mediation within seven (7) calendar days of receipt of disciplinary warning report. The request for mediation needs to be given to either the immediate supervisor or HR. Mediation is facilitated by specially trained and certified internal mediators. With mutual consent of both parties, an external mediator may be used. It is expected that mediation will be conducted and concluded within three (3) weeks of the request. All parties to the mediation are expected to participate in good faith and attend scheduled sessions. The opportunity to mediate will be forfeited if the above expectations are not met.

(b) (6), (b) (7)(C)

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**From:** (b) (6), (b) (7)(C)  
**Sent:** Monday, (b) (6), (b) (7)(C), 2016 5:42 PM  
**To:** (b) (6), (b) (7)(C)  
**Cc:** (b) (6), (b) (7)(C)  
**Subject:** RE: (b) (6), (b) (7)(C)  
**Attachments:** (b) (6), (b) (7)(C)\_Written\_Warning.doc

I issued (b) (6), (b) (7)(C) a written warning today for refusing to follow the prescribed L1 Structured Communication format. (b) (6) did not receive the feedback well stating (b) (6) was being singled-out and target for termination due to "non-participation." I made it clear that the L1 structured communication process is a company-wide process that is followed at ALL the other breweries. I also reinforced that moving forward (b) (6) will be subject to progressive discipline for any failure to follow work directives.

(b) (6), (b) (7)(C)

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**From:** (b) (6), (b) (7)(C)  
**Sent:** Monday, (b) (6), (b) (7)(C), 2016 8:11 AM  
**To:** (b) (6), (b) (7)(C)  
**Cc:** (b) (6), (b) (7)(C)  
**Subject:** RE: (b) (6), (b) (7)(C)

Thanks (b) (6), (b) (7)(C), we will get on your calendar today.

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**From:** (b) (6), (b) (7)(C)  
**Sent:** Monday, (b) (6), (b) (7)(C) 2016 8:00 AM  
**To:** (b) (6), (b) (7)(C)  
**Cc:** (b) (6), (b) (7)(C)  
**Subject:** RE: (b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

During this morning's pre-shift I conducted the meeting because (b) (6), (b) (7)(C) was not sitting at the desktop when I walked into the room. I addressed the group by saying "I'm just filling in today until we get a volunteer from the team to run the pre-shift." (b) (6), (b) (7)(C) then stated, "I will run the pre-shift if you want me to run the pre-shift but I'm going to run it the way I want to run it." (b) (6) continued saying (b) (6) would not read the information from the pre-shift form but would just "roll through it." (b) (6) asked if I was willing to have this discussion and asked if the pre-shift meeting was the place to have that discussion. I replied, "definitely not we will talk about it offline." After the pre-shift meeting (b) (6), (b) (7)(C) and I had our discussion and (b) (6) basically stated that (b) (6) would not follow the structured communication format if (b) (6) has to facilitate the pre-shift meeting. I offered (again) to coach (b) (6), (b) (7)(C) through the structured communication process but (b) (6) declined stating, "(b) (6), (b) (7)(C) felt like (b) (6) was being forced to do something that is voluntary on other Teams." I explained that's true but ONLY because no one volunteered on (b) (6), (b) (7)(C) Team so the Team would have to rotate. (b) (6), (b) (7)(C) then stated "I'm taking a stand on this so just go ahead and write me up." (b) (6) continued on saying (b) (6) didn't think it was right to force (b) (6), (b) (7)(C) to do the pre-shift because it's not required anywhere in the guidelines. I told (b) (6), (b) (7)(C) that we need to setup up sometime with (b) (6), (b) (7)(C) so that (b) (6) was clear on the expectations around L1 structured communication. Our conversation continued outside the team Room and (b) (6), (b) (7)(C) finally stated that (b) (6), (b) (7)(C) still taking a stand on this issue and maybe (b) (6) would show up in a Teamsters shirt.

When can we setup sometime to talk to (b) (6), (b) (7)(C)? (b) (6), (b) (7)(C) on-shift M, T, F of this week.



(b) (6), (b) (7)(C)

**From:** (b) (6), (b) (7)(C)  
**Sent:** Thursday, (b) (6), (b) (7)(C) 2016 3:14 PM  
**To:** (b) (6), (b) (7)(C)  
**Cc:** (b) (6), (b) (7)(C)  
**Subject:** RE: (b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

Get on the calendar with (b) (6), (b) (7)(C) or I in the next couple of days, with (b) (6), (b) (7)(C) we need to be as clear as possible what (b) (6) is not doing or needs to do differently, and hold (b) (6), (b) (7)(C) accountable to that. I suggest after the conversation we summarize in an e-mail to (b) (6), (b) (7)(C) so (b) (6) knows it was documented.

Thanks.

(b) (6), (b) (7)(C)

**From:** (b) (6), (b) (7)(C)  
**Sent:** Thursday, (b) (6), (b) (7)(C) 2016 3:00 PM  
**To:** (b) (6), (b) (7)(C)  
**Cc:** (b) (6), (b) (7)(C)  
**Subject:** RE: (b) (6), (b) (7)(C)

What are yall's thoughts with (b) (6), (b) (7)(C)? I spoke to (b) (6), (b) (7)(C) about this topic for about 45min and (b) (6) continues to have a strong negative opinion. At the end of the day, (b) (6), (b) (7)(C) openly responded to me saying (b) (6) would not respond to any constructive feedback for facilitating pre-shift meetings.

(b) (6), (b) (7)(C) I overheard parts of the conversation you had with (b) (6), (b) (7)(C) last week over facilitating pre-shifts.

What steps, if any, should we take next about this issue?

Thanks,

(b) (6), (b) (7)(C)

**From:** (b) (6), (b) (7)(C)  
**Sent:** Wednesday, (b) (6), (b) (7)(C) 2016 8:29 AM  
**To:** (b) (6), (b) (7)(C)  
**Cc:** (b) (6), (b) (7)(C)  
**Subject:**  
**Importance:** High

This was the worst whse handover audit I have seen in months. Facilitator was not engaged to say the least felt (b) (6) wasn't set up to be successful, side bar conversations all over the place. Some members of the team vividly expressed little to no value for the meeting especially having to take turns *facilitating* it. (b) (6), (b) (7)(C) attempted to keep them on track but it was obvious they were not giving (b) (6), (b) (7)(C) the respect (b) (6), (b) (7)(C) deserved. I gave them an 80 but really not sure they deserved that.

(b) (6)

(b) (6), (b) (7)(C)

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**From:** (b) (6), (b) (7)(C)  
**Sent:** Friday, September 08, 2017 9:13 AM  
**To:** (b) (6), (b) (7)(C)

(b) (6), (b) (7)(C) /2016

Today I had a conversation with (b) (6), (b) (7)(C) about teamwork and job knowledge. I observed (b) (6), (b) (7)(C) skimming through pre-shift material without engaging the team. Additionally, I observed (b) (6), (b) (7)(C) actively calling out to another team member saying the pre-shift material was worthless. I expressed the lack of engagement caused numerous side bar conversations throughout the meeting and created a negative team culture from (b) (6), (b) (7)(C) actions. I shared moving forward the expectation is to speak to the material by engaging the team during that period of time. I also shared that this was the second time (b) (6), (b) (7)(C) has received feedback while leading the pre shift. Lastly, I asked what I could do as (b) (6), (b) (7)(C) to help (b) (6), (b) (7)(C) with the pre-shift material.

(b) (6), (b) (7)(C) /2017

(b) (6), (b) (7)(C)

6:20pm

Fact finding investigation with (b) (6), (b) (7)(C).

Present (b) (6), (b) (7)(C)

I asked (b) (6), (b) (7)(C) to tell me about the incident this morning with (b) (6), (b) (7)(C).

(b) (6), (b) (7)(C) indicated the line wasn't running so (b) (6) took off (b) (6) coveralls and went to restroom to wash up, (b) (6) stopped in the breakroom briefly, this was about 645am. (b) (6), (b) (7)(C) came out of the pre-shift meeting and seen (b) (6), (b) (7)(C) in the breakroom. (b) (6) looked at the clock in the breakroom and (b) (6) asked (b) (6), (b) (7)(C) what are you doing in here, your not suppose to be in here, come into my office. (b) (6), (b) (7)(C) indicated (b) (6), (b) (7)(C) was very antagonizing. (b) (6) indicated (b) (6) tone was demeaning.

(b) (6), (b) (7)(C) went into the office with the door shut. (b) (6), (b) (7)(C) indicated to (b) (6), (b) (7)(C) that (b) (6) was going to hold (b) (6), (b) (7)(C) accountable. (b) (6) said (b) (6), (b) (7)(C) said I told you I was going to hold you accountable. If you do anything not in the guidelines I will hold you accountable.

(b) (6), (b) (7)(C) indicated (b) (6) was shaking because how (b) (6), (b) (7)(C) was handling (b) (6), (b) (7)(C) deameanor. "It was everything I could do to just get out of here". We asked (b) (6), (b) (7)(C) what was said that made (b) (6), (b) (7)(C) so upset. (b) (6), (b) (7)(C) said every word that comes out of (b) (6), (b) (7)(C) is a threat. (b) (6) speaks in a threatening manner. Its (b) (6), (b) (7)(C) tone. (b) (6), (b) (7)(C) asked if they were done—(b) (6), (b) (7)(C) didn't say anything so (b) (6), (b) (7)(C) got up and walked out of the office. (b) (6), (b) (7)(C) then indicated one (b) (6), (b) (7)(C) was 10ft away that they were not done talking. (b) (6), (b) (7)(C) stood there. There was some confusion with (b) (6), (b) (7)(C) whether (b) (6) walked out of the office 2 or 3 times.

I ask (b) (6), (b) (7)(C) to elaborate on the shaking. (b) (6) said (b) (6) just gets to me. (b) (6) just needs to leave me alone. I was upset. I asked (b) (6), (b) (7)(C) if (b) (6) was aggressive toward (b) (6), (b) (7)(C) (b) (6) said personally I don't think it was aggressive but I was shaking mad at that point.

When (b) (6) walked back in the last time (b) (6), (b) (7)(C) was standing in the way. So (b) (6) walked forward. (b) (6), (b) (7)(C) indicated (b) (6) couldn't get in the door bc (b) (6), (b) (7)(C) was standing there and (b) (6), (b) (7)(C) was telling him to get back in the office so (b) (6) stepped very close to (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) asked what (b) (6) was doing and (b) (6), (b) (7)(C) said I was doing what (b) (6) told me to do—get back in the office. I asked (b) (6), (b) (7)(C) to show me how close (b) (6) was to (b) (6), (b) (7)(C) (b) (6) indicated (b) (6) was about 6 inches from (b) (6), (b) (7)(C) but has to be bc (b) (6), (b) (7)(C) wouldn't move. (b) (6), (b) (7)(C) finally moved to (b) (6) chair, then just said the same thing about holding (b) (6), (b) (7)(C) accountable and if there were any issues beyond that point (b) (6) would be on a written warning. (b) (6), (b) (7)(C) indicated that (b) (6), (b) (7)(C) just keep drilling that point home. (b) (6), (b) (7)(C) indicated to (b) (6), (b) (7)(C) and to (b) (6), (b) (7)(C) and myself that this was bordering on Federal Witness Tampering and told (b) (6), (b) (7)(C) (b) (6) needed to listen and let (b) (6), (b) (7)(C) speak now. (b) (6), (b) (7)(C) indicated if (b) (6), (b) (7)(C) keeps pushing (b) (6), (b) (7)(C) was going to file a federal claim. (b) (6), (b) (7)(C) indicated to (b) (6), (b) (7)(C) to do what (b) (6) thinks (b) (6) needs to do.



(b) (6), (b) (7)(C) indicated (b) (6) walked out and left the plant at that point.

(b) (6), (b) (7)(C) highlighted that (b) (6), (b) (7)(C) covered the shift over the weekend and (b) (6), (b) (7)(C) made a complement to the team; 6 different team members said its bc (b) (6), (b) (7)(C) wasn't there to breathe down their neck. (b) (6), (b) (7)(C) looked at (b) (6), (b) (7)(C) and said isn't that right. (b) (6), (b) (7)(C) verified the comment was made. (b) (6), (b) (7)(C) indicated see I'm not the only one that feels this way; the entire shift feels this way.

(b) (6), (b) (7)(C) highlighted this frustration with (b) (6), (b) (7)(C) has escalated and built up. (b) (6), (b) (7)(C) just makes (b) (6), (b) (7)(C) very upset. (b) (6), (b) (7)(C) indicated (b) (6), (b) (7)(C) just needs to leave (b) (6), (b) (7)(C) alone—period.

(b) (6), (b) (7)(C) highlighted (b) (6), (b) (7)(C) has no issues with any other (b) (6), (b) (7)(C). (b) (6), (b) (7)(C) indicated that (b) (6), (b) (7)(C) coached (b) (6), (b) (7)(C) recently and (b) (6), (b) (7)(C) was fine with it. It is just (b) (6), (b) (7)(C) has the issue with. We asked if (b) (6), (b) (7)(C) had had performance issues recently. (b) (6), (b) (7)(C) said yea—but with the new BPS system; how are we not going to make errors.

(b) (6), (b) (7)(C) asked (b) (6), (b) (7)(C) about (b) (6), (b) (7)(C) recent coaching with (b) (6), (b) (7)(C) was present). (b) (6), (b) (7)(C) indicated (b) (6), (b) (7)(C) wanted to speak about (b) (6), (b) (7)(C) performance. (b) (6), (b) (7)(C) looked at (b) (6), (b) (7)(C) and said do what you need to do; then walked out. (b) (6), (b) (7)(C) asked why (b) (6), (b) (7)(C) responded this way, (b) (6), (b) (7)(C) said bc I knew why I was there. (b) (6), (b) (7)(C) asked if it was (b) (6), (b) (7)(C) delivering the message if (b) (6), (b) (7)(C) would have an issue. (b) (6), (b) (7)(C) said (b) (6), (b) (7)(C) don't have issues with any other (b) (6), (b) (7)(C). Everything that comes out of (b) (6), (b) (7)(C) mouth is a threat.

(b) (6), (b) (7)(C) highlighted (b) (6), (b) (7)(C) prefers not to be in room alone with (b) (6), (b) (7)(C). I advised I expected (b) (6), (b) (7)(C) to act professionally and return to work I asked if (b) (6), (b) (7)(C) could do that. (b) (6), (b) (7)(C) said absolutely.

(b) (6), (b) (7)(C) indicated in order to prevent a workplace violence issue; (b) (6), (b) (7)(C) shouldn't be in room alone with (b) (6), (b) (7)(C). (b) (6), (b) (7)(C) said I know that doesn't sound right but I don't want (b) (6), (b) (7)(C) coaching me anymore. (b) (6), (b) (7)(C) just needs to leave me alone and (b) (6), (b) (7)(C) pointed to (b) (6), (b) (7)(C) hat—like my hat says. (b) (6), (b) (7)(C) hat indicates "Dysfunctional (b) (6), (b) (7)(C) Leave me Alone."

I advised this was an active investigation and we would get back to (b) (6), (b) (7)(C) with a decision at the conclusion. I expect (b) (6), (b) (7)(C) to act professionally and have a working relationship with (b) (6), (b) (7)(C).

Conversation ended at 6:50pm

(b) (6), (b) (7)(C) /2017

(b) (6), (b) (7)(C) spoke to (b) (6), (b) (7)(C) this morning. (b) (6), (b) (7)(C) was in the warehouse breakroom this morning at 645am with (b) (6), (b) (7)(C) lunchbox ready to leave. (b) (6), (b) (7)(C) pulled (b) (6), (b) (7)(C) into (b) (6), (b) (7)(C) office to review the recent performance issues and provided this as another example for (b) (6), (b) (7)(C) to improve upon. At this point, (b) (6), (b) (7)(C) walked out of the office. (b) (6), (b) (7)(C) indicated the conversation was not over. (b) (6), (b) (7)(C) walked back to the office, pushed the door, got very close to (b) (6), (b) (7)(C) pinning (b) (6), (b) (7)(C) against the desk. (b) (6), (b) (7)(C) asked (b) (6), (b) (7)(C) what (b) (6), (b) (7)(C) was doing. (b) (6), (b) (7)(C) said just coming back in your office. (b) (6), (b) (7)(C) indicated -well sit down then so we can finish. The conversation continued.

I am waiting to get something from (b) (6), (b) (7)(C) concerning the interaction, (b) (6), (b) (7)(C) was concerned about the escalation of behavior with (b) (6), (b) (7)(C)

I went and spoke to (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C) to see if they witnessed—no witnesses but (b) (6), (b) (7)(C) told them about the exchange.

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C) has indicated that (b) (6), (b) (7)(C) had a coaching with (b) (6), (b) (7)(C) several weeks ago that (b) (6), (b) (7)(C) sit in on—(b) (6), (b) (7)(C) indicated that (b) (6), (b) (7)(C) gets frustrated with (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) indicated (b) (6), (b) (7)(C) performance needed to improve but (b) (6), (b) (7)(C) indicated it was going to continue to happen. (b) (6), (b) (7)(C) stated (b) (6), (b) (7)(C) has since given (b) (6), (b) (7)(C) a coaching and (b) (6), (b) (7)(C) thanked (b) (6), (b) (7)(C) for it. I asked (b) (6), (b) (7)(C) why (b) (6), (b) (7)(C) believed that (b) (6), (b) (7)(C) has difficulty with (b) (6), (b) (7)(C) coaching. (b) (6), (b) (7)(C) said (b) (6), (b) (7)(C) thought (b) (6), (b) (7)(C) feels (b) (6), (b) (7)(C) micro-manages. I asked if (b) (6), (b) (7)(C) behavior is directed only at (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) said no, (b) (6), (b) (7)(C) treats everyone the same—(b) (6), (b) (7)(C) is consistent with all on (b) (6), (b) (7)(C) shift. I asked if (b) (6), (b) (7)(C) thought (b) (6), (b) (7)(C) is a threat to anyone, (b) (6), (b) (7)(C) indicated (b) (6), (b) (7)(C) only has issues with (b) (6), (b) (7)(C)

I spoke to (b) (6), (b) (7)(C) about the interaction with (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) indicated (b) (6), (b) (7)(C) did not witness or hear the conversation this morning but (b) (6), (b) (7)(C) told (b) (6), (b) (7)(C) about it after the fact. (b) (6), (b) (7)(C) also indicated that (b) (6), (b) (7)(C) is a consistently low performance employee. (b) (6), (b) (7)(C) has directed (b) (6), (b) (7)(C) to hold (b) (6), (b) (7)(C) shift accountable and turn around their performance and that is what (b) (6), (b) (7)(C) is doing. I asked if (b) (6), (b) (7)(C) is a threat to anyone, (b) (6), (b) (7)(C) indicated (b) (6), (b) (7)(C) feels (b) (6), (b) (7)(C) may not be mentally stable at times. (b) (6), (b) (7)(C) had a conversation with (b) (6), (b) (7)(C) about (b) (6), (b) (7)(C) vacation. (b) (6), (b) (7)(C) indicated (b) (6), (b) (7)(C) paced the floor the entire time because (b) (6), (b) (7)(C) could not get this place out of (b) (6), (b) (7)(C) mind.

(b) (6), (b) (7)(C)

Today I spoke with (b) (6), (b) (7)(C) after I had a conversation with (b) (6), (b) (7)(C) about what needed to be relayed and after I found (b) (6), (b) (7)(C) in the Break room ready to leave @6:46am. I called (b) (6), (b) (7)(C) into my office and stated that I had 2 things to cover. One being that (b) (6), (b) (7)(C) should not be in the break room ready to leave 15 min prior to the end of the shift. (b) (6), (b) (7)(C) asked if this was the first time and to my knowledge I said yes. I explained that (b) (6), (b) (7)(C) should not be doing that we would both have something said to us if (b) (6), (b) (7)(C) or (b) (6), (b) (7)(C) were aware of it. (b) (6), (b) (7)(C) responded that (b) (6), (b) (7)(C) wouldn't say anything to (b) (6), (b) (7)(C) about it. I challenged that response. (b) (6), (b) (7)(C) went further to explain that I did this to (b) (6), (b) (7)(C) I put (b) (6), (b) (7)(C) in a situation to fail on the keg line. I reminded (b) (6), (b) (7)(C) that I offered to take (b) (6), (b) (7)(C) off the UPL's at (b) (6), (b) (7)(C) request. (b) (6), (b) (7)(C) then stated that I "brow beat (b) (6), (b) (7)(C) off the UPL's". (b) (6), (b) (7)(C) went to say that I needed to watch what I was doing and leave (b) (6), (b) (7)(C) alone as this was close to being a federal case and I needed to watch it. I asked (b) (6), (b) (7)(C) if (b) (6), (b) (7)(C) was threatening me and said no. (b) (6), (b) (7)(C) stated that it could be a federal case if (b) (6), (b) (7)(C) wants it to be. (b) (6), (b) (7)(C) stated that (b) (6), (b) (7)(C) has already escalated to corporate. I told (b) (6), (b) (7)(C) was free to do what (b) (6), (b) (7)(C) thought (b) (6), (b) (7)(C) needed but it was not going to change that we are all held accountable. (b) (6), (b) (7)(C) implied that was not being held accountable at which time (b) (6), (b) (7)(C) walked out of the office. I told (b) (6), (b) (7)(C) I was not done finished with the conversation. (b) (6), (b) (7)(C) came back in which (b) (6), (b) (7)(C) reiterated (b) (6), (b) (7)(C) previous arguments and proceeded to leave again in which I told (b) (6), (b) (7)(C) I was not finished with the conversation. At this point as I was holding the door (b) (6), (b) (7)(C) walks in glaring at me in what appeared to be aggressive manner and invades my personal space to the point that I asked what (b) (6), (b) (7)(C) was doing and if (b) (6), (b) (7)(C) was trying to get in my face. (b) (6), (b) (7)(C) stated that (b) (6), (b) (7)(C) was trying to enter the office so I asked (b) (6), (b) (7)(C) to step aside and let me move and I proceeded to shut the door. At this point I stated that any further conversations related to performance would result in further disciplinary action. (b) (6), (b) (7)(C) responded with "are you threatening me, your threatening my job" I replied with no it is not a threat and repeated that (b) (6), (b) (7)(C) has been coached multiple times for multiple issues and any further issues would result in further disciplinary action. (b) (6), (b) (7)(C) said (b) (6), (b) (7)(C) was going across the street and left the office. At this point I phoned (b) (6), (b) (7)(C) to give a heads up that (b) (6), (b) (7)(C) may be coming.



## DISCIPLINARY ACTION FORM



DATE:

EMPLOYEE NAME (b) (6), (b) (7)(C)	DATE OF HIRE (b) (6), (b) (7)(C)	MANAGER NAME (b) (6), (b) (7)(C)	<input type="checkbox"/> FIRST WRITTEN WARNING
DEPARTMENT Warehouse	SHIFT/TEAM SILVER TEAM	OTHERS PRESENT (b) (6), (b) (7)(C)	<input checked="" type="checkbox"/> FINAL WRITTEN WARNING
			<input type="checkbox"/> DISCHARGE

(NATURE OF PROBLEM, DATE, TIME, PLACE, ETC.)

On (b) (6), (b) (7)(C) /2017, (b) (6), (b) (7)(C) found you in the break room out of your work area prior to the end of your shift. (b) (6), (b) (7)(C) discussed this concern with you and discussed recent performance issues with you. During that time, you indicated you became upset and mad and just needed to get out of there. You approached (b) (6), (b) (7)(C) in an aggressive manner to the point (b) (6), (b) (7)(C) was backed against (b) (6), (b) (7)(C) desk and as you stated you were face to face with only a few inches apart. (b) (6), (b) (7)(C) asked what you were doing. You advised you were coming into (b) (6), (b) (7)(C) office like (b) (6), (b) (7)(C) asked. (b) (6), (b) (7)(C) requested you to have a seat to continue the conversation. You advised (b) (6), (b) (7)(C) in this conversation that (b) (6), (b) (7)(C) needed to watch (b) (6), (b) (7)(C).

In the fact finding investigation you also indicated that you are concerned of the potential for a Workplace Violence Issue. You indicated you should not be in the room alone with (b) (6), (b) (7)(C). You acknowledged you have anger dealing with (b) (6), (b) (7)(C).

This type of behavior is inappropriate in the workplace; as stated in the Code of Business Conduct, unwelcome conduct that could create an intimidating, hostile or offensive work environment has no place in our Company. Our Shenandoah Policy Guide work rules and corrective discipline policy also indicates disrespectful or disruptive behavior and inability to work collaboratively is subject to disciplinary actions up to and including discharge.

This is your final warning.

Here is your performance history since November of 2016.

(b) (6), (b) (7)(C) /2016 Coaching for performance issue.

(b) (6), (b) (7)(C) /2016 First written for not meeting set job objectives.

(b) (6), (b) (7)(C) /17 Final written that was reduced to a first written on (b) (6), (b) (7)(C) /17 (through appeal) for performance related issue.

(b) (6), (b) (7)(C) 17- Coaching for being a couple minutes late to pre-shift meeting

(b) (6), (b) (7)(C) 2017- Coaching for not wearing a seat belt (2<sup>nd</sup> discussion for same reason.)

(b) (6), (b) (7)(C) /2017- Coaching incorrect process order ran incorrectly.

(b) (6), (b) (7)(C) /2017- Coaching for picking up pallets that had a different product description than what was on the screen.

(b) (6), (b) (7)(C) 2018<sup>1</sup> Coaching for confirming product in the wrong bin.

(b) (6), (b) (7)(C) 2017- (b) (6), (b) (7)(C) discussed the coaching trend and advised any additional performance related issues would result in a final written warning. The details for your behavior during that conversation on the 10<sup>th</sup> are outlined above.

I am familiar with the provisions of  
policy Work Rules & Corrective Discipline

☒ Yes  
☐ No\*

I am familiar with the complaints and appeal  
procedure

☒ Yes  
☐ No

EMPLOYEE STATEMENT	
EMPLOYEE SIGNATURE/DATE	NOTE: SIGNATURE ACKNOWLEDGES RECEIPT, HOWEVER, DOES NOT INDICATE AGREEMENT.
<div style="display: flex; justify-content: space-between;"> <div style="width: 30%;"> <div style="background-color: black; width: 100px; height: 40px; margin-bottom: 5px;">(b) (6), (b) (7)(C)</div> <div style="background-color: black; width: 100px; height: 40px;">(b) (6), (b) (7)(C)</div> </div> <div style="width: 60%;"> <p>asked to have <span style="background-color: black; color: black;">(b) (6), (b) (7)(C)</span> lawyer review this Final Warning before signing.</p> </div> </div>	
<input checked="" type="checkbox"/> EXPLAINED WORK RULES & CORRECTIVE DISCIPLINE	<div style="display: flex; justify-content: space-between;"> <div style="width: 40%;"> <div style="background-color: black; width: 100px; height: 40px;">(b) (6), (b) (7)(C)</div> </div> <div style="width: 40%;"> <div style="background-color: black; width: 100px; height: 40px;">(b) (6), (b) (7)(C)</div> </div> <div style="width: 20%; text-align: right;"> 117 </div> </div>
FOR HUMAN RESOURCES USE ONLY.	
EMPLOYEE SIGNATURE/DATE <div style="background-color: black; width: 100px; height: 40px;">(b) (6), (b) (7)(C)</div>	DATE <div style="background-color: black; width: 100px; height: 40px;">(b) (6), (b) (7)(C)</div> 117

Shenandoah Appeal Process:

An employee may use the appeal process to resolve conflict or disagreement related to disciplinary action.

1. Employees wishing to appeal disciplinary action must place the request in writing within seven (7) calendar days of receipt of the disciplinary action. The request shall be given to either the immediate supervisor or Employee Relations Manager.
2. The Appeal Hearing should be conducted and concluded within three (3) weeks of the request unless an extension is agreed upon by both parties.
3. All appeal participants shall to engage in the appeal process in good faith and attend scheduled sessions.
4. The opportunity to appeal will be forfeited if the above expectations are not met.



5135 S. EASTSIDE HIGHWAY  
ELKTON, VA 22827  
540.289.8000  
www.MillerCoors.com

(b) (6), (b) (7)(C) /2017

#### Mandatory EAP Referral

(b) (6), (b) (7)(C) must comply with a mandatory referral to the Employee Assistance Program (EAP).

Failure to comply with the mandatory referral or with any MillerCoors policy or procedure will result in termination of employment.

Employee will be placed on a paid suspension immediately through (b) (6), (b) (7)(C). During this time the employee needs to contact EAP. EAP must be contacted by 5pm on (b) (6), (b) (7)(C) 2017 and an initial interview must be completed by that time.

You must attend the appointment as scheduled by the EAP appointment coordinator.

If you refuse the mandatory referral and do not contact EAP by 5pm on (b) (6), (b) (7)(C) 2017 then your employment with us will be ended. If you fail to comply or attend sessions scheduled by the EAP coordinator then your employment will end.

- Employee understands (b) (6) must contact the Employee Assistance Program (EAP) and successfully complete any treatment or care recommended by the EAP, employee authorizes the EAP and/or provider of such treatment or care to inform the Company about (b) (6) compliance with directives of the program.
- Employee understands that (b) (6) employment is conditioned on (b) (6) adherence to and satisfactory compliance with the item listed above, as well as all work requirements and policies of MillerCoors.

You will remain off work until cleared to return by the EAP process.

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)



(b) (6), (b) (7)(C)

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**From:** (b) (6), (b) (7)(C)  
**Sent:** Thursday, (b) (6), (b) (7)(C), 2017 5:47 PM  
**To:** (b) (6), (b) (7)(C)  
**Subject:** (b) (6), (b) (7)(C) -17

On (b) (6), (b) (7)(C)/17 I met with (b) (6), (b) (7)(C), along with (b) (6), (b) (7)(C), to provide a mandatory referral to MillerCoors EAP (Employee Assistance Program), and to issue a Final Written warning as a result of an investigation into events which happened on (b) (6), (b) (7)(C) 17 between (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C).

(b) (6), (b) (7)(C) explained to (b) (6), (b) (7)(C) the purpose of the meeting was to follow up on (b) (6), (b) (7)(C) conversation with (b) (6), (b) (7)(C) on (b) (6), (b) (7)(C)/17. I then told (b) (6), (b) (7)(C) that our primary concern was the safety and wellbeing of our employees including (b) (6), (b) (7)(C). I wanted to make sure we were doing the right thing to ensure all our employees felt that had a work environment that was safe. (b) (6), (b) (7)(C) thanked me for that.

I issued the mandatory EAP referral and read the document to (b) (6), (b) (7)(C). I explained multiple times that this was a requirement for continue employment at MillerCoors. (b) (6), (b) (7)(C) indicated that (b) (6), (b) (7)(C) understood, and was actually relieved. (b) (6), (b) (7)(C) believed this is what was needed, and (b) (6), (b) (7)(C) did not want to be the problem". (b) (6), (b) (7)(C) said (b) (6), (b) (7)(C) would call at 8AM the next morning.

I next issued (b) (6), (b) (7)(C) a Final Written Warning based on (b) (6), (b) (7)(C) actions on the morning of (b) (6), (b) (7)(C)/17, as well as repeated performance related coachings and progressive discipline (b) (6), (b) (7)(C) had received over the last year. (b) (6), (b) (7)(C) said (b) (6), (b) (7)(C) would like for (b) (6), (b) (7)(C) lawyer to review the discipline before (b) (6), (b) (7)(C) signed it. I told (b) (6), (b) (7)(C) that was (b) (6), (b) (7)(C) choice, but refusal to sign the discipline did not admit acceptance, it only acknowledged receipt. (b) (6), (b) (7)(C) said (b) (6), (b) (7)(C) wasn't refusing to sign, but (b) (6), (b) (7)(C) wanted (b) (6), (b) (7)(C) lawyer to review it first. I told (b) (6), (b) (7)(C) that was fine, and I was going to make a note of that on the discipline, and (b) (6), (b) (7)(C) would sign the discipline as a witness. (b) (6), (b) (7)(C) agreed.

(b) (6), (b) (7)(C) asked (b) (6), (b) (7)(C) to sign the EAP referral, and (b) (6), (b) (7)(C) agreed without hesitation. (b) (6), (b) (7)(C) escorted (b) (6), (b) (7)(C) to (b) (6), (b) (7)(C) car, and retrieved (b) (6), (b) (7)(C) badge. (b) (6), (b) (7)(C) left without incident.

(b) (6), (b) (7)(C) • Shenandoah Brewery  
5135 South Eastside Highway • Elkton, Virginia • 22827  
Office (b) (6), (b) (7)(C) • Cell (b) (6), (b) (7)(C) • Fax (540) 289-8320

(b) (6), (b) (7)(C)

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**From:** (b) (6), (b) (7)(C)  
**Sent:** Thursday, (b) (6), (b) (7)(C), 2017 5:34 PM  
**To:** (b) (6), (b) (7)(C)  
**Cc:** (b) (6), (b) (7)(C)  
**Subject:** Meeting With (b) (6), (b) (7)(C)

Meeting went well. (b) (6) was actually appreciate of the EAP referral and said it was what (b) (6) needed. (b) (6) was not as happy with the Final, but did not make a big issue. (b) (6) only stated that (b) (6) wanted (b) (6) lawyer to review it before (b) (6) would sign. (b) (6), (b) (7)(C) signed as a witness.

(b) (6) indicated that (b) (6) would call EAP at 8AM tomorrow.

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Today (b) (6), (b) (7)(C) I sat in on a conversation with (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C). The conversation was to investigate the chain of events that happened between (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C) the morning of (b) (6), (b) (7)(C).

- Below is the interpretation I understood from both parties:

--(b) (6), (b) (7)(C) walked out of pre-shift passing the warehouse break room at 6:48am. (b) (6), (b) (7)(C) recognized (b) (6), (b) (7)(C) washing up and watching the television screen. Then, (b) (6), (b) (7)(C) told (b) (6), (b) (7)(C) to step into the office to have a talk. In the course of the conversation, (b) (6), (b) (7)(C) coached (b) (6), (b) (7)(C) on leaving (b) (6), (b) (7)(C) work center early before the shift ended. (b) (6), (b) (7)(C) said (b) (6), (b) (7)(C) felt threatened in this conversation to the point where (b) (6), (b) (7)(C) got so frustrated (b) (6), (b) (7)(C) had to leave the office. While (b) (6), (b) (7)(C) left the office, (b) (6), (b) (7)(C) immediately went out to ask (b) (6), (b) (7)(C) to step back into the office for a second time because (b) (6), (b) (7)(C) was not finished with the conversation. While (b) (6), (b) (7)(C) was stepping back into the office, (b) (6), (b) (7)(C) was holding the door open. (b) (6), (b) (7)(C) stopped in the door way looking face-to-face with (b) (6), (b) (7)(C) (only 2inch gap between (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C) chests). (b) (6), (b) (7)(C) started to lean backwards on the desk since there was nowhere to go; Additionally, (b) (6), (b) (7)(C) asked (b) (6), (b) (7)(C) " is there a problem?" (b) (6), (b) (7)(C) responded, "no, you asked me to step into the office so I did." (b) (6), (b) (7)(C) responded, "well, come in and sit down." After (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C) cleared the doorway, (b) (6), (b) (7)(C) started to coach (b) (6), (b) (7)(C) on (b) (6), (b) (7)(C) overall job performance and how it was trending negative. (b) (6), (b) (7)(C) said (b) (6), (b) (7)(C) felt threatened by (b) (6), (b) (7)(C) conversation and began to get frustrated again; eventually, (b) (6), (b) (7)(C) left the office and went to (b) (6), (b) (7)(C) car. --

- In the conversation, (b) (6), (b) (7)(C) noted (b) (6), (b) (7)(C) got so frustrated (b) (6), (b) (7)(C) started to shake and ball (b) (6), (b) (7)(C) fists up. (b) (6), (b) (7)(C) also stated (b) (6), (b) (7)(C) had to remove (b) (6), (b) (7)(C) from the situation because (b) (6), (b) (7)(C) frustration built up so bad. I asked (b) (6), (b) (7)(C) "why did you get so frustrated?" (b) (6), (b) (7)(C) responded, "...because (b) (6), (b) (7)(C) threatens me and my job." I asked (b) (6), (b) (7)(C) to clearly define "what are (b) (6), (b) (7)(C) threats?" (b) (6), (b) (7)(C) responded, " (b) (6), (b) (7)(C) says, 'from this point moving forward, you will be held accountable for your actions'."
- (b) (6), (b) (7)(C) continued to comment on how (b) (6), (b) (7)(C) wants (b) (6), (b) (7)(C) to leave (b) (6), (b) (7)(C) alone and let (b) (6), (b) (7)(C) do (b) (6), (b) (7)(C) job. (b) (6), (b) (7)(C) also requested to have a process leader or HR sit in every conversation/interaction (b) (6), (b) (7)(C) has with (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) and I kindly responded and said we could not accommodate that request justifying that anything significant could happen at any point in time such as safety, quality, or staffing which would require an interaction between the two.
- During the conversation, (b) (6), (b) (7)(C) told (b) (6), (b) (7)(C) and I that (b) (6), (b) (7)(C) was treating every member of Silver team equally. (b) (6), (b) (7)(C) did not deny that (b) (6), (b) (7)(C) stood face-to-face with (b) (6), (b) (7)(C) Additionally, (b) (6), (b) (7)(C) said there was a justifiable reason why (b) (6), (b) (7)(C) approached (b) (6), (b) (7)(C) in the break room early Monday morning (leaving (b) (6), (b) (7)(C) work center early before the shift ended)
- I also asked questions about how (b) (6), (b) (7)(C) got frustrated in past situations.
  1. First time- I witnessed (b) (6), (b) (7)(C) get frustrated was when (b) (6), (b) (7)(C) and I walked out to the can UPL's in order to seek-to-understand how a process order was changed over incorrectly. During that conversation, (b) (6), (b) (7)(C) started to ball (b) (6), (b) (7)(C) fists and become angry. While we were explaining the situation, (b) (6), (b) (7)(C) would get frustrated and walk away. This happened several times.



2. Second time- I witnessed a coaching conversation where (b) (6), (b) (7)(C) responded to (b) (6), (b) (7)(C) "I already know...do whatever you need to do...the problem will continue to happen. Bye" Then (b) (6), (b) (7)(C) walked out of the office before (b) (6), (b) (7)(C) could finish (b) (6), next sentence.

After refreshing (b) (6), (b) (7)(C) memory on these events, (b) (6) did not deny that they occurred. (b) (6), (b) (7)(C) says (b) (6), frustration has continued to build up over the last 2 years.

- (b) (6), (b) (7)(C) asked (b) (6), (b) (7)(C) if (b) (6) was fit to perform the normal functions of (b) (6), job without getting frustrated or creating a hostile working environment. (b) (6), (b) (7)(C) confidently said "yes, in fact I will act beyond professional"
- I asked if there was anything I could do to help with anything (b) (6) was getting frustrated about. Rodger said, "no."
- At the end, (b) (6), (b) (7)(C) and I informed (b) (6), (b) (7)(C) where (b) (6) stood in the corrective action process at MillerCoors. We stated that (b) (6) had been coached a number of times by (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C) over the last several months and (b) (6), overall job performance had trended negative. We shared that (b) (6), next coaching could result in a final warning if (b) (6), job performance did not improve. (b) (6), understood.

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

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(b) (6), (b) (7)(C) (b) (6), (b) (7)(C)

After people meeting asked  
if [REDACTED] thought [REDACTED] harassed  
team members.

[REDACTED] said no, but [REDACTED] micromanages.  
If something clown [REDACTED] wants to  
know why.

Asked if [REDACTED] ever felt uncomfortable  
around [REDACTED] said no.  
Is [REDACTED] threatening - No

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

Asked if [redacted] thinks [redacted] antagonizes [redacted]

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

- No. [redacted] treats them all the same [redacted] has a tough team that doesn't perform

When [redacted] covered for [redacted] a person did say it was nice not having [redacted] breathing down their neck.

"I don't know why [redacted] has such a hard time w [redacted] I can give [redacted] a coaching + [redacted] thanks me but [redacted] can say the exact same thing + [redacted] gets very upset"

(b) (6), (b) (7)(C)

[redacted] indicated [redacted] set in on a coach [redacted] + [redacted] was disrespectful + rude.



(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

walked out before  
even finished.

(b) (6), (b) (7)(C)

doesn't like

just ~~later~~

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

I haven't seen do  
anything wrong

(b) (6), (b) (7)(C) came into my office at 915am wanting to “get a few things off (b) (6), (b) (7)(C) chest”. (b) (6), (b) (7)(C) started discussing how “things just aren’t right around here and (b) (6), (b) (7)(C) is tired of it.” I asked (b) (6), (b) (7)(C) to explain. (b) (6), (b) (7)(C) said that (b) (6), (b) (7)(C) is looking for a way to get rid of (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C) is an excellent employee and knows it’s not right. I asked (b) (6), (b) (7)(C) to give me specific details. (b) (6), (b) (7)(C) indicated (b) (6), (b) (7)(C) continues to coach (b) (6), (b) (7)(C) many times on issues and everyone makes mistakes but (b) (6), (b) (7)(C) is not allowed to make a mistake without someone speaking to (b) (6), (b) (7)(C) about it. I advised it is (b) (6), (b) (7)(C) responsibility to hold their team accountable; if someone is making mistakes and not held accountable; they never learn how to improve. I asked (b) (6), (b) (7)(C) to confirm (b) (6), (b) (7)(C) performance mistakes. (b) (6), (b) (7)(C) said yea but I should be allowed to make errors. (b) (6), (b) (7)(C) then indicated (b) (6), (b) (7)(C) was working on the worst most dangerous machine here—the UPL and that machine has killed people here. I asked (b) (6), (b) (7)(C) to elaborate to my knowledge no one has been injured on the machine. (b) (6), (b) (7)(C) said it happened in Golden, someone was decapitated; they stood up in the machine and it took their head off. (b) (6), (b) (7)(C) said and we are making people work on equipment that has been known to kill people—(b) (6), (b) (7)(C) don’t understand. (b) (6), (b) (7)(C) said no one locks and tags out the equipment and (b) (6), (b) (7)(C) wanted to highlight that as an issue and (b) (6), (b) (7)(C) going to speak to (b) (6), (b) (7)(C) about all (b) (6), (b) (7)(C) safety concerns. I highlighted the BOS audits is an excellent way to get safety issues addressed and (b) (6), (b) (7)(C) should be bringing safety issues forward and not ignoring things (b) (6), (b) (7)(C) feels is unsafe. (b) (6), (b) (7)(C) said (b) (6), (b) (7)(C) is going to make sure to speak to safety. (b) (6), (b) (7)(C) then went back to (b) (6), (b) (7)(C) harasses (b) (6), (b) (7)(C) by wearing (b) (6), (b) (7)(C) pants down below (b) (6), (b) (7)(C) waste. (b) (6), (b) (7)(C) is directly being disrespectful to (b) (6), (b) (7)(C) by wearing them this way and (b) (6), (b) (7)(C) is not held accountable for this and (b) (6), (b) (7)(C) performance. I asked if (b) (6), (b) (7)(C) felt like (b) (6), (b) (7)(C) should know if (b) (6), (b) (7)(C) is discussing (b) (6), (b) (7)(C) performance (b) (6), (b) (7)(C) said yes. I indicated that conversation is private and (b) (6), (b) (7)(C) should not be aware. (b) (6), (b) (7)(C) indicated (b) (6), (b) (7)(C) does not have any issues with any of the other (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) said (b) (6), (b) (7)(C) has provided coachings to (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C) is fine with (b) (6), (b) (7)(C) is constantly speaking to (b) (6), (b) (7)(C) about (b) (6), (b) (7)(C) performance and (b) (6), (b) (7)(C) feels like (b) (6), (b) (7)(C) is on a hit list to get rid of (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) highlighted that (b) (6), (b) (7)(C) indicated team members came to (b) (6), (b) (7)(C) about (b) (6), (b) (7)(C) attitude. (b) (6), (b) (7)(C) is not a team player and does not perform up to team standards. (b) (6), (b) (7)(C) highlighted this to (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) feels this is an example of harassment. (b) (6), (b) (7)(C) asked (b) (6), (b) (7)(C) team members if anyone said anything and they all denied it. I asked if (b) (6), (b) (7)(C) coaches other team members and (b) (6), (b) (7)(C) said yes—we all feel (b) (6), (b) (7)(C) micromanages. (b) (6), (b) (7)(C) said (b) (6), (b) (7)(C) knows everybody looks at that team as not performing but (b) (6), (b) (7)(C) needs to think about (b) (6), (b) (7)(C) approach. (b) (6), (b) (7)(C) doesn’t make things better. (b) (6), (b) (7)(C) indicated (b) (6), (b) (7)(C) also went to (b) (6), (b) (7)(C) to highlight (b) (6), (b) (7)(C) concerns but all (b) (6), (b) (7)(C) wanted to do was highlight all the mistakes (b) (6), (b) (7)(C) was making and indicate (b) (6), (b) (7)(C) performance is lacking. (b) (6), (b) (7)(C) also indicated (b) (6), (b) (7)(C) knows (b) (6), (b) (7)(C) is a good performer bc of all the issues (b) (6), (b) (7)(C) brings up get corporate review and approval (examples include new corporate LOTO procedure, new focus on training, increase in staffing levels) all this was bc (b) (6), (b) (7)(C) highlighted these concerns. (b) (6), (b) (7)(C) indicated (b) (6), (b) (7)(C) is an OSHA inspector and (b) (6), (b) (7)(C) is really considering calling OSHA to make a surprise visit. (b) (6), (b) (7)(C) said believe me, you would much rather want me inside then outside when I make a complaint. I asked (b) (6), (b) (7)(C) to elaborate on what (b) (6), (b) (7)(C) meant. (b) (6), (b) (7)(C) indicated that if (b) (6), (b) (7)(C) is valued as an employee (b) (6), (b) (7)(C) would work more on correcting the issues; than highlighting all the issues (b) (6), (b) (7)(C) can find as an OSHA inspector. I encouraged (b) (6), (b) (7)(C) to highlight any safety issues so they can be addressed properly.

(b) (6), (b) (7)(C) was agitated during the conversation. (b) (6), (b) (7)(C) left my office at 10am; thanking me for letting (b) (6), (b) (7)(C) get it off (b) (6), (b) (7)(C) chest.



(b) (6), (b) (7)(C)

Anyone hurt on UPL?

- Not that [redacted] aware of

glared comment by [redacted] (b) (6), (b) (7)(C)

[redacted] (b) (6), (b) (7)(C) don't think true

LOTO -

[redacted] (b) (6), (b) (7)(C) expect ees to LOTO equipment  
if ees not following safety proc.  
[redacted] (b) (6), (b) (7)(C) needs to tell us who, when



(b) (6), (b) (7)(C) 2017

(b) (6), (b) (7)(C)

MillerCoors  
Elkton, VA

To Whom It May Concern,

This is to serve as a formal apology for any misunderstanding formed due to comments that I made in the workplace environment on (b) (6), (b) (7)(C). My intent was constructive in nature. My concern is for the safety of our family of coworkers. I was worried that another accident in the work place would have negative consequences for Mille-Coors.

My direct involvement in Safety planning has been oriented towards preventing any re-occurrence of an industrial accident similar to the deadly methane gas explosion. Towards that end I have been instrumental in prodding management into corrective action on the following issues:

1. Flammable lockers not grounded throughout the facility
2. Proper storage of plastic and paper dunnage with respect to fire suppression
3. Lock-out tag-out procedures and work instructions
4. The removal of all fire hoses throughout the facility saving the corporation money,
5. Day to day vigilance and guidance to fellow coworkers
6. Calling attention to sewer/methane which led to bringing the facility into EPA Compliance,
7. Industrial Environmental Hygiene
8. Pre-shift Meeting Guidelines
9. Designed and developed the Training Matrix, which is being implemented corporate wide
10. Team Coordinator Role guidelines and expectations

I've been a loyal employee for almost (b) (6) years and I take pride in my work and my history of positive contributions to a safe and well-functioning workplace. If in my dedication to works safety I was a little over eager and let my personal emotions be perceived as negative, I am truly sorry. I make a personal commitment to keep my personal attitude in check and respectfully request forgiveness for my comments.

Sincerely,

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

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